

Danbury Neighbourhood Plan Regulation 16 Consultation

Schedule of responses received

Response ID	Name	Organisation	PID No	Consultation Point
DNP-1	Mrs Jane Young	Public	1355287	Section 5
DNP-2	Mr Paul Coombes	Public	1355386	Site B: Land at Tyndales Farm West
DNP-4	Kevin Fursse	Public	1355911	Site B: Land at Tyndales Farm West
DNP-5	Mrs Lucy Bennett	Public	1356033	Site B: Land at Tyndales Farm West
DNP-6	Louise Hewitt	Public	1356043	Site B: Land at Tyndales Farm West
DNP-8	Mrs Deborah Nicol	Public	1356110	General
DNP-9	Mrs Martin Crisp	Essex Bridleways Association	1356287	Policy DNP14
DNP-10	Mrs Anne Hallett	Public	1356477	General
DNP-11	Mr Andrew Murtha	Public	1326588	Para 5.7
DNP-12	Mr Andrew Murtha	Public	1326588	Section 5
DNP-13	Mr Andrew Murtha	Public	1326588	DNP1, Figure 5
DNP-14	Mr Andrew Murtha	Public	1326588	Para 4.1, Vision
DNP-15	Mr Andrew Murtha	Public	1326588	Para 1.27
DNP-16	Mr Andrew Murtha	Public	1326588	Para 5.1
DNP-17	Mr Andrew Murtha	Public	1326588	Section 6
DNP-18	Mr Andrew Murtha	Public	1326588	DNP1 Table
DNP-21	Mr Keith Sandum	Public	1356670	General See comments in red on attachment (note this is Reg 14 document): Para 2.18, Para 4.2 Environment Objective, Para 6.18, Policy DNP14, Key Views (New) 12, Para 10.1
DNP-22	Mrs Nicola Waters	Public	1356683	General - Assume Site B: Land at Tyndales Farm West
DNP-24	Mrs Kate Smolen	Public	1356754	Site B: Land at Tyndales Farm West
DNP-25	Mrs Tavia Buckingham	Public	1356834	Site B: Land at Tyndales Farm West
DNP-27	Mr Bobby Hagger	Public	1356845	Site B: Land at Tyndales Farm West
DNP-28	Mr Matthew Ward	Public	1356850	Site B: Land at Tyndales Farm West
DNP-29	Mr Scott Newland	Public	1356870	Site B: Land at Tyndales Farm West
DNP-30	Edward Power	Public	1357011	Site B: Land at Tyndales Farm West
DNP-32	Mrs Victoria Ward	Public	1357080	Site B: Land at Tyndales Farm West
DNP-33	Mr Philip Sands	Public	1357241	Site B: Land at Tyndales Farm West
DNP-34	Mrs Diana Adams	Public	1357229	Site B: Land at Tyndales Farm West
DNP-35	Mr Trevor Hollinger (for Agent)	Blenheim Consultancy Services	1355497	Policy DNP1
DNP-36	Mr Trevor Hollinger (for Agent)	Blenheim Consultancy Services	1355497	Site D: Danecroft, Woodhill Road
DNP-39	Mrs Jennifer Poel	Public	1357689	Site B: Land at Tyndales Farm West
DNP-40	Dr Anthony Lipscomb	Public	1357458	Site B: Land at Tyndales Farm West
DNP-41	Mrs Jennifer Poel	Public	1357689	Site B: Land at Tyndales Farm West
DNP-42	Emilia Ayms	Public	1358025	General
DNP-43	Mrs Abbie Hodgson	Public	1358410	General - Assume Site B: Land at Tyndales Farm West
DNP-44	Mrs Sue Lees	Public	1358427	Site B: Land at Tyndales Farm West
DNP-45	Mrs Margaret Fursse	Public	1358563	General - Assume Site B: Land at Tyndales Farm West
DNP-46	Mr Robert Alcock	Public	1358597	Site D: Danecroft, Woodhill Road
DNP-47	Mrs Judy Alcock	Public	1358716	Site D: Danecroft, Woodhill Road
DNP-48	Mr Robert Alcock	Public	1358597	Site D: Danecroft, Woodhill Road
DNP-49	Isabelle Buckingham	Public	1356836	Site B: Land at Tyndales Farm West
DNP-50	Mr Andy Watts	Public	1358921	Site B: Land at Tyndales Farm West
DNP-51	Phoebe Conway (for Agent)	Martin Grant Homes	1327864	DNP1

DNP-52	Phoebe Conway (for Agent)	Martin Grant Homes	1327864	Site A: Land at Sandpit Field
DNP-53	Phoebe Conway (for Agent)	Martin Grant Homes	1327864	Other: Land at Little Fields
DNP-55	Mr Trevor Hollinger (for Agent)	Blenheim Consultancy Services	1355497	Policy DNP9
DNP-56	Jacqui George	Public	1359111	Site A: Land at Sandpit Field
DNP-57	Mrs Jane Pace	Public	1359144	Site D: Danecroft, Woodhill Road
DNP-58	Mr Chris Higgins	Public	1359164	Site B: Land at Tyndales Farm West
DNP-59	Mr Chris Higgins	Public	1359164	Site B: Land at Tyndales Farm West
DNP-60	Mr Chris Higgins	Public	1359164	Site B: Land at Tyndales Farm West
DNP-61	Mrs Barbara Hallett	Public	1359169	Site B: Land at Tyndales Farm West
DNP-62	Mr David Hallett	Public	1359172	Site B: Land at Tyndales Farm West
DNP-63	Mr Kevin Fraser	Essex County Council	311148	General
DNP-64	Mr Christopher Tressider	Public	1358480	Site B: Land at Tyndales Farm West
DNP-65	Mr John Palmer	Public	1359294	Site B: Land at Tyndales Farm West
DNP-66	Mr Steve George	Public	1359319	Site A: Land at Sandpit Field
DNP-67	Jenny Fryer (for Agent)	Richborough	1329382	Chapter 5 and Chapter 6
DNP-68	Mr Stefan Todman	Public	1359375	General
DNP-69	Mrs Alison Todman	Public	1359376	General
DNP-70	Miss Louise Jeffries	Public	1357266	General
DNP-71	Mr Christopher Jones	Public	1359379	General
DNP-72	Mr Malcolm Reid	Public	1359380	Site D: Danecroft, Woodhill Road
DNP-74	Mr Ali Mashadi	Public	1359387	Site D: Danecroft, Woodhill Road
DNP-75	Mrs Pennie Lipscomb	Public	1356597	Site B: Land at Tyndales Farm West
DNP-76	Mrs Debbie Wakefield	Public	1359391	Site B: Land at Tyndales Farm West
DNP-77	Mr Arthur Allen	Public	307946	Section 1, Para 2.29, Section 3, Para 4.1, Section 5, Section 6, DBP7, DNP8, DNP9, DNP10, DNP12, Section 7, DNP14, Section 8, Section 9, DNP16, Section 11
DNP-79	Mrs Nicola Ware	Public	1359397	Site B: Land at Tyndales Farm West
DNP-80	Jacqueline Murrells	Public	1359399	Site D: Danecroft, Woodhill Road
DNP-82	Mr Stewart Heath	Public	1359458	Site D: Danecroft, Woodhill Road
DNP-83	Mrs Janet Reid	Public	1359502	Site D: Danecroft, Woodhill Road
DNP-84	Mr Lee Caswell	Public	1355909	Site B: Land at Tyndales Farm West
DNP-85	Mrs Kate Churchouse	Public	1357160	Site B: Land at Tyndales Farm West
DNP-86	Mr Nick Harvey	Public	1359614	Site A: Land at Sandpit Field
DNP-87	Mr Matthew Parsons	Public	1355280	Site B: Land at Tyndales Farm West
DNP-88	Emma Sexton	Public	1359657	Site B: Land at Tyndales Farm West
DNP-89	Sandra Green	National Trust	1358507	Policy DNP9
DNP-90	Gordon Hudson	Public	1359685	Site D: Danecroft, Woodhill Road
DNP-91	Toni Caswell	Public	1359702	Site B: Land at Tyndales Farm West
DNP-92	Rory Kyle (for Agent)	Landvest Developments Ltd	1358211	Para 5.4, Policy DNP1, Policy DNP17
DNP-93	Ms Michelle Harper	Danbury Parish Council	1097102	General
DNP-94	Mr Ryan Hartles	Public	1359883	Site B: Land at Tyndales Farm West
DNP-95	Mr Martin Jackson	Public	1273228	Site B: Land at Tyndales Farm West
DNP-96	Mrs Susan Pattinson	Public	1359923	Site B: Land at Tyndales Farm West
DNP-97	Mr Graeme Bennett	Public	1359936	Site B: Land at Tyndales Farm West
DNP-98	Miss Sara Miller	Public	1359944	Site B: Land at Tyndales Farm West
DNP-99	Mrs Nicola Gibson	Public	1359932	Site B: Land at Tyndales Farm West
DNP-100	Mrs Gill Carter	Public	1359945	Site B: Land at Tyndales Farm West
DNP-102	Mrs Elisa Sandle	Public	1359960	Site D: Danecroft, Woodhill Road
DNP-103	Mr Michael Sandle	Public	1359964	Site D: Danecroft, Woodhill Road
DNP-104	Mr Robert Murrells	Public	1359963	Foreword, Site D: Danecroft, Woodhill Road, Section 7, Section 11
DNP-105	Mr Richard Sandlan	Public	1359999	Site B: Land at Tyndales Farm West

DNP-106	Mr Trevor Hollinger (for Agent)	Blenheim Consultancy Services	1355497	Policy DNP4
DNP-107	Ben Hatt (for Agent)	Gleeson Land	1360019	General
DNP-108	Mrs Sarah Power	Public	1360020	Site B: Land at Tyndales Farm West
DNP-109	Mr David Nichols	Public	1360021	Site B: Land at Tyndales Farm West
DNP-110	Mrs Helen Quill	Public	1360023	Site B: Land at Tyndales Farm West
DNP-111	Mrs Hazel Green	Public	1360056	Site D: Danecroft, Woodhill Road
DNP-112	Mrs Hazel Green	Public	1360056	Site D: Danecroft, Woodhill Road
DNP-113	Mrs Hazel Green	Public	1360056	Site D: Danecroft, Woodhill Road
DNP-115	Mr Max Campbell	Public	1360100	General
DNP-116	Chelmsford City Council	Chelmsford City Council	1252951	General
DNP-117	Mr Michael Priaulx	Swifts Local Network: Swifts & Planning Group	1360192	Policy DNP6
DNP-118	Mrs Anne Jackson	Public	1360006	Site B: Land at Tyndales Farm West
DNP-119	Mr Craig Lane	Public	1360564	Site D: Danecroft, Woodhill Road
DNP-120	Mrs Karen Cooper	Public	1356489	Site D: Danecroft, Woodhill Road
DNP-121	Lisa Braben	Public	1360567	Site B: Land at Tyndales Farm West
DNP-122	Mrs Hazel Moore	Public	1359689	Policy DNP1
DNP-123	Mrs Hazel Moore	Public	1359689	Site D: Danecroft, Woodhill Road
DNP-124	Mrs Hazel Moore	Public	1359689	Policy DNP5
DNP-125	Mr Patrick Heaphy	Public	1360641	Site D: Danecroft, Woodhill Road
DNP-126	Olivia James (for Agent)	Stonebond (Chelmsford) Ltd	1329320	General, Section 5, DNP1, DNP2, DNP17
DNP-127	Mr Kenneth Axon	Public	1359566	Site E: Land at Mayes Lane
DNP-128	Mr Chris Waldron	Defence Infrastructure Organisation	1360660	General
DNP-129	Mr Andrew Ransome (for Agent)	Mr and Mrs G and J Thompson and Wilson	1360873	DNP1, Site E: Land at Mayes Lane
DNP-130	Mr R Agnew	Gladman Developments Ltd	1301644	Vision, Policy DNP1, Policy DNP2, Policy DNP6, Policy DNP14
DNP-131	Mr Sam Hollingworth (for Agent)	Medical Services Danbury	1330259	General
DNP-132	Mr Shamsul Hoque	National Highways	1338584	General
DNP-133	Mr Jonathan Thombs	Public	1357634	Para 5.13, 5.17, 5.18

Comment

Consultee Mrs Jane Young (1355287)
Email Address
Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation
Comment by Mrs Jane Young (1355287)
Comment ID DNP-1
Response Date 10/05/24 09:23
Status Processed
Submission Type Web
Version 0.2

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Housing & Development Section 5

Question 2

Please add your comments below

I have lived in Danbury for 3 years now. I absolutely love it but the only down side is the lack of local amenities. The medical centre cannot cope with the amount of people living in the area, we only have 2 small local food shops and one dental surgery that cannot take on anymore NHS patients.

If you are going to build more new homes in the area then you need to consider how this will impact on our already struggling local services.

There will also be an impact on the already, overused, A414. This is a very busy road and the increase in traffic will have a detrimental effect on the local environment.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mr Paul Coombes (1355386)
Email Address
Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation
Comment by Mr Paul Coombes (1355386)
Comment ID DNP-2
Response Date 11/05/24 11:03
Status Processed
Submission Type Web
Version 0.2

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Development of Homes at Tyndales Farm West

Question 2

Please add your comments below

Whilst I agree with the decision of the Parish Council, when considering the final number of Homes to be built I would ask that the impact on the flow of traffic through Danbury is fully assessed and understood and also takes into account potential additional movements coming from the adjacent Quarry which looks like it is going to be enlarged. I would also ask that due consideration is given to the environment currently protecting the residents of Cherry Garden Lane, Hyde Green and Barley Mead and the views that they currently enjoy.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Agent Kevin Fursse
(1355910)

Email Address

Address

Consultee

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Kevin Fursse (1355911)

Comment ID DNP-4

Response Date 19/05/24 15:40

Status Processed

Submission Type Web

Version 0.3

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site B: Land at Tyndales Farm West

Question 2

Please add your comments below

Regarding site plan B : housing at the eastern edge of the village will necessitate traffic volumes through the village being unnecessarily increased. A huge tract of agricultural land will be forever lost . The lanes are already overused by traffic trying to escape the A414. Wildlife regularly uses the site and will be lost if buildings are allowed.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mrs Lucy Bennett (1356033)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mrs Lucy Bennett (1356033)

Comment ID DNP-5

Response Date 20/05/24 22:44

Status Processed

Submission Type Web

Version 0.3

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site B: Land at Tyndales Farm West

Question 2

Please add your comments below

I would like to express my concern about the use of site B for the potential development of 65 houses. Traffic - the main road is already at capacity. To drive through the village takes considerable time particularly at peak times. This results in small lanes being used as a rat race.

The proposed entrance near Cherry Garden will mean high volumes of traffic onto a very busy stretch of road near to school bus stops. Children from Tge Sandon School have to cross the road on a blind bend which is more hazardous with increased traffic. Traffic at present is often at a standstill in peak times by the proposed entrance.

Hyde Lane and Cherry Garden are very narrow lanes (single track) with tight corners used frequently by pedestrians, school children, cyclists and horse riders.

Development on site b will inevitably increase traffic on these very small lanes leading to increased risk for all using them.

Facilities- the current doctors Beaconhealth is already struggling with demand with totally inadequate provision for the area. Reviews of poor service can be read online.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Agent Louise Hewitt (1356041)

Email Address

Address

Consultee

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16
Consultation

Comment by Louise Hewitt (1356043)

Comment ID DNP-6

Response Date 20/05/24 23:25

Status Processed

Submission Type Web

Version 0.3

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site B: Land at Tyndales Farm West

Question 2

Please add your comments below

Part of the site allocation process advises the that the sites are to meet part of important criteria. One of those being not to impact on important views. Tyndalls farm being located in the Eastern edge of the village which is viewed from the A414. It's on the edge on Runsell Green which is noted for its smaller country roads. Part of the proposal would be for a new Main Road junction at a ready dangerous blind bend with Cherry Garden Lane South. There is a public walk way right of access directly through the farmers field that would be impacted should this site be approved for future development. No consideration has been thought of the homes bordering this site and the additional impact of potentially 120 more cars using Hyde Lane, Mill Lane and Cherry Garden Lane as a cut throughs.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

If you wish to submit any supporting information, please upload it here [IMG_0138.jpeg](#)

If you wish to submit any supporting information, please upload it here [IMG_1021.jpeg](#)





Comment

Consultee Mrs Deborah Nicol (1356110)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16
Consultation

Comment by Mrs Deborah Nicol (1356110)

Comment ID DNP-8

Response Date 22/05/24 12:21

Status Processed

Submission Type Web

Version 0.3

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below General

Question 2

Please add your comments below

This will not work as the infrasture can't cope nor can schools and doctors

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mr Martin Crisp (1356287)
Email Address
Company / Organisation Essex Bridleways Association
Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation
Comment by Essex Bridleways Association (Mr Martin Crisp -1356287)
Comment ID DNP-9
Response Date 22/05/24 15:47
Status Processed
Submission Type Web
Version 0.2

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Provision of Recreational Facilities DNP14

Question 2

Please add your comments below

It is pleasing to note the level of importance attached to the provision and creation of PRowS throughout the plan. Essex Bridleways Association ('EBA') notes that the Parish enjoys 8 bridleways, and is encouraged to see the significance attached to improving connectivity beyond the Parish boundaries where possible.

Given that Danbury is to enter a growth phase with c.100 new houses to be constructed, we would like to see emphasis being placed on the use of Section 106 monies for the development and maintenance of the PRow network. This would tie in with one aspect of Supporting document 7, where 19% of respondents considered that PRowS could be better maintained.

Comment

Consultee Mrs Anne Hallett (1356477)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16
Consultation

Comment by Mrs Anne Hallett (1356477)

Comment ID DNP-10

Response Date 23/05/24 15:08

Status Processed

Submission Type Web

Version 0.3

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below General

Question 2

Please add your comments below

We are only a village and cannot support a lot of houses being built !
The traffic through Danbury is really busy now.
You can't get an appointment at the Medical Centre now, let alone with extra houses being built !
Please don't allow planning permission.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mr Andrew Murtha (1326588)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mr Andrew Murtha (1326588)

Comment ID DNP-11

Response Date 24/05/24 08:17

Status Processed

Submission Type Web

Version 0.1

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Paragraphs in Section 5.7 on page 29 discussing the allocation on Site A

Question 2

Please add your comments below

Disproportionate Allocation: The plan allocates 65% of new housing to a single site (Site A), which seems to contradict the village's expressed values of preserving its cultural, historical, and environmental character. This approach can be seen as disproportionately burdening one part of the village, potentially chosen for its lower visibility and likelihood of objection, rather than an equitable distribution of development.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mr Andrew Murtha (1326588)
Email Address
Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation
Comment by Mr Andrew Murtha (1326588)
Comment ID DNP-12
Response Date 24/05/24 08:20
Status Processed
Submission Type Web
Version 0.1

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Section 5, specifically the introduction to housing development on page 27, where the overall strategy for site allocation is discussed

Question 2

Please add your comments below

Strategic Convenience Over Community Concerns: Locating the bulk of development in a less visible area suggests a strategy aimed at minimizing resistance rather than genuinely integrating new housing into the community in a balanced way. This could be perceived as prioritizing ease of approval over a more harmonious and sensitive development approach.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mr Andrew Murtha (1326588)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mr Andrew Murtha (1326588)

Comment ID DNP-13

Response Date 24/05/24 08:22

Status Processed

Submission Type Web

Version 0.1

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Housing Site Allocations DNP1, Figure 5 on page 30 showing the distribution of allocated housing sites

Question 2

Please add your comments below

Lack of Creative and Equitable Planning: Concentrating development significantly in one location rather than distributing it more evenly across the village appears to be a planning shortcut. It lacks a creative solution that would more appropriately balance new growth with the existing village landscape and character.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mr Andrew Murtha (1326588)
Email Address
Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation
Comment by Mr Andrew Murtha (1326588)
Comment ID DNP-14
Response Date 24/05/24 08:29
Status Processed
Submission Type Web
Version 0.1

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Introduction and Vision and Objectives, particularly the Vision on page 25, which sets out the long-term commitment for the planning period

Question 2

Please add your comments below

Premature Commitment to Long-Term Plans: Committing to 93% of the village's 15-year housing allocation at the outset limits flexibility and responsiveness to changing community needs and circumstances over time. This early and substantial commitment could prevent the village from adapting its strategies to future conditions and community feedback.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mr Andrew Murtha (1326588)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mr Andrew Murtha (1326588)

Comment ID DNP-15

Response Date 24/05/24 08:30

Status Processed

Submission Type Web

Version 0.1

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Paragraphs in Section 1.27 on page 12 discussing community engagement and the consultation process

Question 2

Please add your comments below

Reduced Community Involvement in Ongoing Development: The planning process may not adequately provide for ongoing community involvement or feedback, which is crucial for maintaining a development approach that truly reflects residents' evolving needs and preferences.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mr Andrew Murtha (1326588)
Email Address
Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation
Comment by Mr Andrew Murtha (1326588)
Comment ID DNP-16
Response Date 24/05/24 08:30
Status Processed
Submission Type Web
Version 0.1

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Housing and Development Section 5.1 on page 27 where housing strategy is outlined without incremental growth considerations

Question 2

Please add your comments below

Neglecting Incremental and Sustainable Growth Strategies: By not adopting an incremental approach to development, the plan misses opportunities to assess the impact of initial housing developments and adjust subsequent plans accordingly. This could result in long-term negative impacts on the village's character and livability that could have been mitigated through a more cautious and phased approach.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mr Andrew Murtha (1326588)
Email Address
Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation
Comment by Mr Andrew Murtha (1326588)
Comment ID DNP-17
Response Date 24/05/24 08:31
Status Processed
Submission Type Web
Version 0.1

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Environment Section 6, starting on page 51, which discusses environmental considerations but may not align perfectly with planning decisions

Question 2

Please add your comments below

Overlooking True Preservation Needs: While the plan extensively discusses preserving the village's character, the actual planning decisions, particularly the heavy concentration of development in one area, do not reflect these preservation principles. True preservation requires visible commitment in planning decisions, not just in preparatory discussions or documents.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mr Andrew Murtha (1326588)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mr Andrew Murtha (1326588)

Comment ID DNP-18

Response Date 24/05/24 08:43

Status Processed

Submission Type Web

Version 0.1

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Table - Housing Site Allocations DNP1

Question 2

Please add your comments below

Discrepancy Between Community Consultation and Housing Allocation: While the Danbury Neighbourhood Plan is underpinned by extensive consultations, rigorous research, and declared commitments to preserve the village's unique values, the final allocation of housing suggests a shortfall in innovative planning aligned with these aspirations. After allocating just 28 houses across five sites, the plan designates an overwhelming 70% of the total housing to Site B: Land at Tyndales Farm West—a decision that starkly contrasts with the distributed approach in other areas. This concentration of development in a less visible, less contested part of the village not only seems to circumvent potential community resistance but also calls into question the sincerity of the planning process in truly adhering to its stated principles of balanced and integrated community development. Such a strategy might inadvertently erode the community trust and engagement that the consultation process aimed to build, ultimately prioritizing expediency over the genuine preservation of Danbury's character and communal well-being.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mr Keith Sandum (1356670)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mr Keith Sandum (1356670)

Comment ID DNP-21

Response Date 26/05/24 13:16

Status Processed

Submission Type Web

Version 0.2

Question 2

Please add your comments below

Thank you for the opportunity to comment.

These comments are the same that I stated during the open public meeting of the plan in Danbury, which the representatives agreed would be added.

They refer to pages 16, 23, 47, 50, 51, 55 and 72

I attach the plan as a pdf with these comments shown in red.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

If you wish to submit any supporting information, please upload it here [Comments On Danbury Plan.pdf](#)

Danbury Neighbourhood Plan

Runsell Green and the Lanes area is a network of old narrow and winding lanes on both sides of the A414 lined with trees, hedges and banks leaving little space for pedestrians. Low density housing has been added over the years.

The Mildmays area includes largely 20th century two storey houses and bungalows. Elm Green Lane and Riffhams Lane are both narrow and winding with no pavements or street lighting.

The Park has later 20th century housing with good sized gardens, woodland edges and greensward which sustain the rural character.

Horne Rowe is an area of unmade and narrow single tracks with no pavements and no street lighting. Housing is largely 18th to 20th century bordering Danbury Common.

For more details see The Danbury Design Guide, (Annex A).

Ludgore Lane is an unlit unmade narrow lane with no pavement, leading from Sporems Lane directly to the Backwarden Nature Reserve with adjoining farm land to the south. There are some 1920s housing by Bakers and also some 18th century dwellings.

- 2.19** Danbury has amenities and facilities including toddler groups, nurseries, primary schools, shops, small businesses, health services (including a surgery and its pharmacy), places of worship, and recreation and leisure facilities. The village has a small supermarket incorporating a cashpoint and the Post Office which provides basic banking services. There are two smaller convenience stores, one of which has a cashpoint. There is also a pharmacy, estate agents, funeral directors and a petrol station. There is a telephone-based Danbury Citizens Advice Bureau.
- 2.20** There are numerous Community groups including Churches, the WEA (Adult Education), The WI, Scout and Guiding Groups, The Danbury Society, amateur dramatics, tennis, football, cricket, gym and exercise classes, snooker and bowling clubs, bridge, amateur radio, photography, First Responders and Neighbourhood Watch. Many of these take place at the Danbury Leisure Centre, the Village Hall and the Old Pavilion.

Regional Context

- 2.21** Situated along the A414, 5 miles to the East of Chelmsford and 5 miles from the West of Maldon, Danbury has good, albeit congested, road transport links to Maldon, Chelmsford, the Dengie Peninsula and the A12.
- 2.22** The A12 connects London to Lowestoft and destinations in between, including Colchester, Ipswich, the A120 (for Stansted Airport), the A130 (for Basildon, Braintree, and Southend and its airport).
- 2.23** There are direct rail transport links into London, Ipswich, Norwich and Clacton on Sea from Chelmsford Railway Station, and Danbury is conveniently located just 2.5 miles from a 'Park and Ride' that provides a service to the city Centre and bus and railway stations.
- 2.24** Danbury is identified as a 'Key Service Settlement' in the Chelmsford Local Plan 2020. As Key Service Settlements "provide a range of key services such as primary schools, local employment opportunities, convenience shopping facilities, community facilities and good

Environment

To seek protection, conservation, and enhancement of this significant element of Danbury's character, open spaces, **local lanes and wildlife and SSSI areas.**

Transport and Movement

To promote clean, safe streets and spaces, seeking creative solutions to the traffic issues that currently affect Danbury, encouraging sustainable transport, addressing parking issues and improvements to pavements where possible.

Recreation and Leisure

To improve Danbury's recreation and leisure facilities and increase provision where a shortfall exists.

Business and Economy

To maintain existing businesses and encourage new economic growth and local employment opportunities, including working from home, to meet and support village needs.

Heritage

Conserve and enhance Danbury's heritage assets and features which contribute to the village. Development should respond positively to and contribute to the special character and qualities that help define Danbury.

Amenities

To ensure that important amenities are retained and sufficient for the future needs of residents.

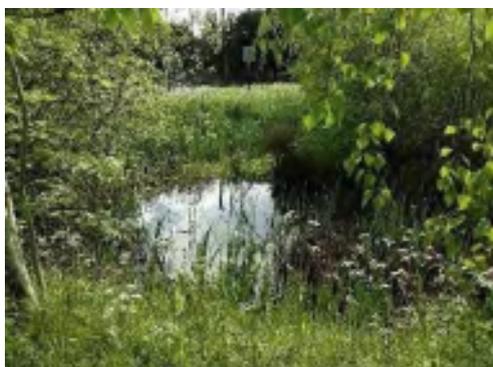
2. Where practicable, sustainable urban drainage systems should be designed to be multi-functional and deliver benefits for wildlife, amenity, and landscape.
3. The design of SUDS should reflect best practice guidance established in the 'Sustainable Drainage Systems Design Guide' for Essex.

6.17 As part of the Essex Design Guide, the County has published good practice design guidance in respect of sustainable drainage systems. This should be referred to in all proposals for development, including both major and minor applications. Guidance and design expectation in respect of a variety of different approaches to sustainable drainage are established, including rainwater and stormwater harvesting, soakaways, filter strips, swales, bioretention areas, infiltration basins, detention basins, ponds, and pervious/permeable materials. Solutions appropriate to the site and context should be designed and consulted upon with the County Council as the lead local flood authority.

The requirements for minor applications are slightly less stringent than for major applications, though still need consulting upon and, where there is a potential flood risk, then sustainable drainage systems should be provided and designed in line with the guidance. The use of hard surfaces (including, for example, the paving over of gardens) should be minimised. Where necessary, hard surfaces should take the form of unlined permeable paving.

It is also recognised that the value of SuDS is not limited to flood mitigation. Their value in improving water quality, amenity improvements and contributing towards biodiversity net gain on sites mean they are strongly supported by Danbury and can be a way of helping to deliver biodiversity net-gain.

6.18 **XXX** The Ponds at Eves Corner and Runsell Green are fed solely by run off from the surrounding roads and in the case of Runsell Green and **Ludgores Lane**, the neighbouring fields, and therefore act as Sustainable Drainage Systems. Both are good examples of how sustainable drainage systems can enhance the biodiversity in an area and in the case of Eves Corner, provide an amenity for residents and a focal point for the Village.



Pond at Runsell Green



Pond at Eves Corner

Landscape Character and Setting

- 6.24** Danbury is set on a hill and enjoys uninterrupted views across the Chelmer Valley, the Blackwater River and Estuary, woodland and farmland. These views are particularly prominent from two landmarks in the Village, St John's Church from the top of the spire, and from the War Memorial. In addition, there are expansive views across Dawson Memorial Field and from Runsell Lane.
- 6.25** **XXX** The Landscape Sensitivity and Capacity Assessment Report, 2017 (Appendix 6a) suggests that Chelmsford City Council planning guidelines conserve the views across each of these landscapes and that new development on the hillsides be sited so as not to intrude on the views.

Danbury Key Views DNP14

Policy DNP14: Danbury Key Views (Figure 7)

1. The following key views are designated for protection:
 - a) St Johns Church, South of the Water Tower, over Hanningfield Reservoir
 - b) From the War Memorial towards Chelmsford
 - c) From Runsell Lane over Blackwater
 - d) From Griffin Hill (A414) looking West towards Chelmsford and beyond
 - e) From the Anchor over The Warren
 - f) From Footpath 38 towards Bradwell Power Station
 - g) Fitzwalter Lane Footpath to Paternoster Farm
 - h) Ludgores Lane looking South towards Bknacre and East Hanningfield
2. Development proposals falling within these views will be expected to be accompanied by a Visual Impact Assessment demonstrating how the benefits of the proposal outweigh the harm caused or that the harm can be suitably mitigated.

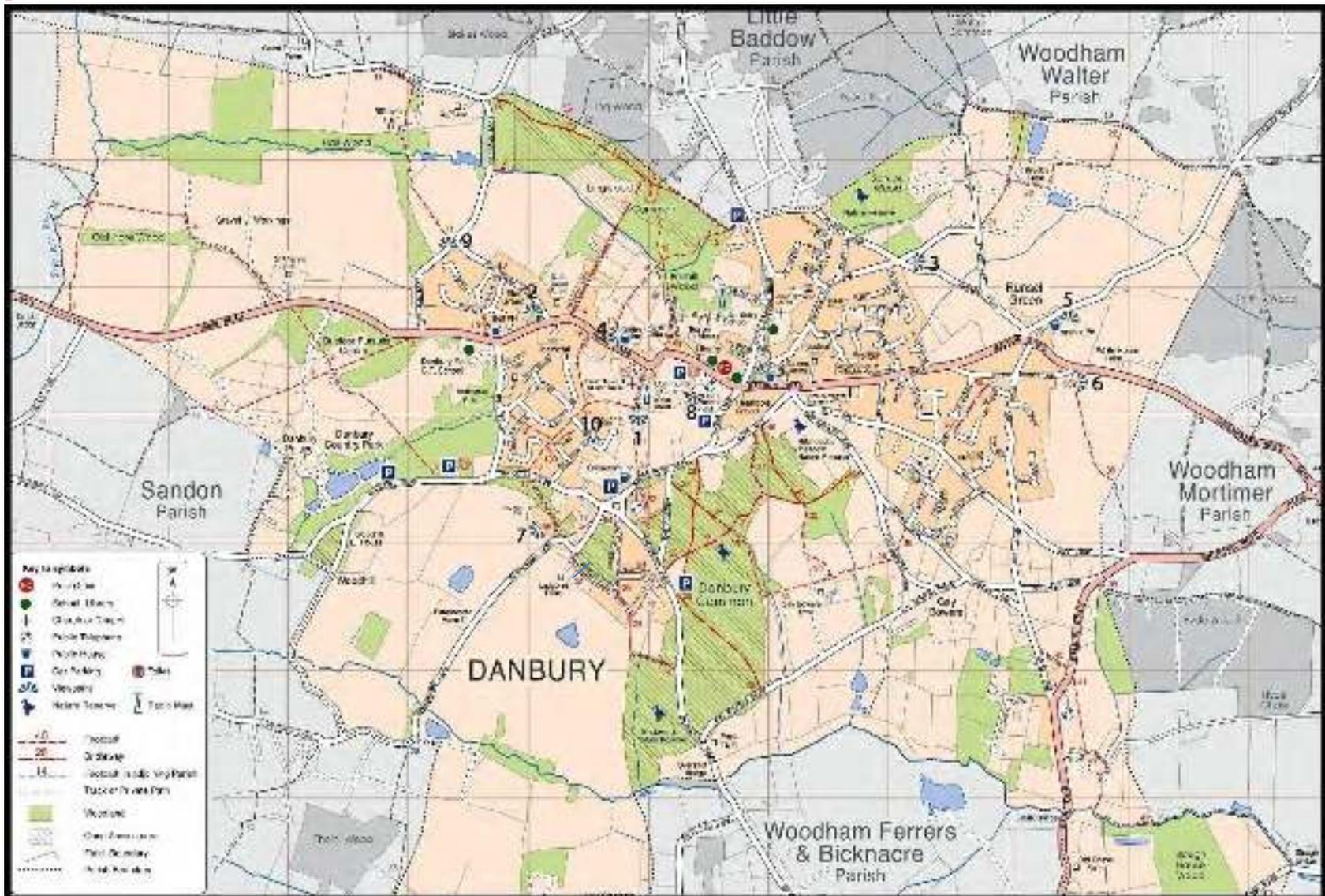
- 6.26** **XXX** Responses to the Residents' Questionnaire (Appendix 11) supported the protection of the seven key views listed below in Policy DNP14. A further 4 views were identified as valued but are either already protected or are less sensitive to development (further details below). The overall importance of the key views is that they show the character of Danbury as a hilltop village with views in all directions. They give a sense of place, space, and wellbeing.

Danbury Neighbourhood Plan

Figure 7: Map of the Key Views of Danbury

ADD View 12 Ludgore Lane to the South

2



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Identification numbers 1 to 11 are itemised below.

Danbury Neighbourhood Plan

10. From Southview Road towards Hanningfield Reservoir

A horizon view glimpsed through a residential area on the rise of the hill. A valued view that 45% of residents would like to see this view protected which would be sensitive, but not particularly susceptible to change due to the elevation.



11. From Hammonds Lane, Sandon near the A414 (west) looking up hill towards Danbury



This view shows the extensive tree cover characteristic of Danbury with St John's Church at its highest point. This is a valued view that 49% of residents would like to see protected, but this should occur naturally due to the elevation. Planning applications need to be mindful of the sensitivity of this view to change e.g. permission for a solar farm nearby required extensive screening.

12. From Ludgores Lane (South) towards Bicknacre and East Hanningfield



This view shows Gibcracks Farm on left and the lake on Ludgores farm on the right. The tree line follows Sandon Brook and further back is East Hanningfield. Buzzards nest in these trees and the brook has resident Kingfishers. It is a wild life corridor linking the Backwarden SSSI site to Blakes Wood

Danbury Neighbourhood Plan

- 18th century boarded cottages Plumptre Lane and Horne Row
- Boarded Well Cottages, south side of Woodhill Road
- Old House, south side of Woodhill Road
- 18/19th century workers' cottages on the north side of Woodhill Road
- Blackmore House
- The vernacular brick cottages south of The Cricketers
- The houses built by Bakers of Danbury along Woodhill Road and Fitzwalter Lane and Ludgores Lane
- Mayesfield
- Griffin Meadow



Photos showing Griffin Meadow from the Main Road - looking west, then east

- 10.2** Together with Danbury's listed buildings and Conservation Area there are old buildings that whilst not listed, contribute to the character of the village. Danbury also has Scheduled Monuments, protected lanes and two registered Parks and Gardens, all of which contribute towards the character of the village and provide clues to its history.
- 10.3** The distribution of Listed Buildings, primarily along the Main/Maldon Road through Danbury hints at the locations of the once separate Hamlets that make up Danbury Parish today.
- 10.4** The historic core of the Parish has been designated as a Conservation Area from The Bell in the west to Bay Meadow in the east.
- 10.5** Remnants of the open spaces that separated each of the three original hamlets (St John's Church area, Eves Corner and Runsell Green) are still in existence today and are an integral part of the historic and landscape character of the village.
- 10.6** The open space at Eves Corner and Frettons House is what remains of the separation between the settlements at Eves Corner and the St John the Baptist Church and provides a buffer from more modern developments to the Southwest. The open space at Bay Meadow provides a buffer between the more modern developments from Runsell Green and the Historic Core at Eves Corner.

Comment

Consultee Mrs Nicola Waters (1356683)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mrs Nicola Waters (1356683)

Comment ID DNP-22

Response Date 27/05/24 13:59

Status Processed

Submission Type Web

Version 0.1

Question 2

Please add your comments below

It is currently already virtually impossible to get out of Hyde lane in the morning due to all the houses having been built in Maldon more houses will only exacerbate this and the fumes from the congestion is getting worse. I strongly object.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mrs Kate Smolen (1356754)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mrs Kate Smolen (1356754)

Comment ID DNP-24

Response Date 28/05/24 13:44

Status Processed

Submission Type Web

Version 0.1

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site Plan B Land at Tyndale Farm West

Question 2

Please add your comments below

We, as a community, cannot stop climate change but we can protect the environment around us. Being a resident of Barley Mead, I hear the Skylarks that live and breed in this field, I see hedgehogs, bats and I have house martins who have nested on my house. I have also heard a number of owls, including the migrating short eared owl. All of these native breeds and visiting birds use this field. If this proposal goes ahead, we are further depleting the numbers of these endangered animals. Are we to enable the destruction of their habitat to satisfy the developers greed? I also saw slowworms for the first time ever under one of the survey mats left on the edge of the field - their habitat also gone for ever if this proposal is passed. There were traps left for field mice in winter (not sure if this is the correct time to place these as surely, the mice would be hibernating?). There has been enough development of green spaces around Chelmsford and it has to stop. We owe it to the ever depleting wildlife to protect them.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mrs Tavia Buckingham (1356834)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mrs Tavia Buckingham (1356834)

Comment ID DNP-25

Response Date 28/05/24 18:37

Status Processed

Submission Type Web

Version 0.2

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site Plan B Land at Tyndall Farm West

Question 2

Please add your comments below

We have seen so much of our lovely peaceful area being taken away. This site is an area of Wildlife and natural beauty which will take away yet another peace of green land for future generations. I live adjacent to this area and I cannot express enough how much traffic and pollution I have seen rise on the main A414 and not to mention the fact it is a fast pace dangerous road which already sees accidents regularly. Not to mention the noise pollution-I I have had to leave my local doctors which is a stones throw from my house due to lack of appointment availability- will this be taken into consideration? I doubt it ? I have a young family and it breaks my heart to see the slow destruction and chopping away at land in my 22 years of living here - our quality of life is in danger of becoming ruined .

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mr Bobby Hagger (1356845)
Email Address
Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation
Comment by Mr Bobby Hagger (1356845)
Comment ID DNP-27
Response Date 28/05/24 21:49
Status Processed
Submission Type Web
Version 0.2

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site Plan B Land at Tyndale Farm West

Question 2

Please add your comments below

I live outside the fields that want to be developed on. This would be extremely horrible and dangerous. The main road is already busy enough and adding more houses will equal to more traffic and more accidents. It will also destroy habitats that live there and ruin wild life homes. Danbury medical centre is already busy enough and is extremely hard to get an appointment with so adding more people will make it even harder as it is. I believe we should save the field and not develop.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mr Matthew Ward (1356850)
Email Address
Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation
Comment by Mr Matthew Ward (1356850)
Comment ID DNP-28
Response Date 29/05/24 08:44
Status Processed
Submission Type Web
Version 0.2

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Document 3 - Site Plan B

Question 2

Please add your comments below

As residents of adjacent to the proposed plan we OBJECT. This "plan" will destroy wildlife, lifestyle and future families way of life. The local lanes cannot cope with the traffic as it is, let alone with an additional 65 houses.

Why can this development not be situated near the A12? Where there are better road links for amenities that people drive to.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mr Scott Newland (1356870)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mr Scott Newland (1356870)

Comment ID DNP-29

Response Date 29/05/24 11:26

Status Processed

Submission Type Web

Version 0.2

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site Specific Policy B: Land at Tyndales Farm West (Area B on Figure 5)

Question 2

Please add your comments below

The A414 is already over utilised which is causing very regular accidents and near-misses especially at the 'blind bend' where this development is proposed. Any access road on to the A414 at this proposed location will cause many more traffic issues and even more delays when travelling through the village in either direction.

There is mention of an access road via Cherry Tree Gardens which is ridiculous as it is a single-track road which leads onto Hyde lane which is already a highly populated and also a single track road. 65 houses in reality could mean more than 300 residents in this quiet rural location which is a long way away for the village schools which are full as are the doctors.

The shops are limited with very few parking spaces which add to the traffic congestion.

The field which is proposed has significant wildlife activity especially deer, bats, birds of prey and newts as well as being a very popular with local families for walking.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Edward Power (1357011)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Edward Power (1357011)

Comment ID DNP-30

Response Date 29/05/24 17:30

Status Processed

Submission Type Web

Version 0.1

Question 2

Please add your comments below

I want to object to Site B/ Land at Tyndales Farm West for 65 houses as part of Danbury Neighbourhood Plan 2023 -26. Comments below in relation to Justification for Site B :

5.21 - This will not retain the character of Danbury it will feel like a housing development on the edge of the village.

5.22 - It is not a short distance if you walk to the amenities, facilities, health care, and schools of Danbury. It is very much on the edge of the village. You will have to walk along the very busy A414. It is over a mile walk to St Johns School and over 1.5 miles to Danbury Park School. Again along the busy A414.

5.23. Access on to and off the A414 will be dangerous as cars drive over quickly along this part of the road and it is already a busy road.

The development will also increase the road traffic through Danbury on the A414 which is already very busy and causes pollution particularly at peak times. Surely a site to the west of the village would make more sense.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mrs Victoria Ward (1357080)
Email Address
Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation
Comment by Mrs Victoria Ward (1357080)
Comment ID DNP-32
Response Date 30/05/24 09:37
Status Processed
Submission Type Web
Version 0.2

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Specifically proposed location B

Question 2

Please add your comments below

As a resident of Hyde Lane, I object strongly to the proposed development of site B, resulting in 65 new homes being built. Not only would the loss of wildlife habitats be a great shame for the area, but the roads (which already have a number of significant and dangerous potholes) would suffer hugely as a result.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mr Philip Sands (1357241)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mr Philip Sands (1357241)

Comment ID DNP-33

Response Date 30/05/24 17:14

Status Processed

Submission Type Web

Version 0.2

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site Plan B Land at Tyndales Farm West

Question 2

Please add your comments below

I would like to object to this proposed development. The surrounding road network is not sufficient to support the potential increase in traffic.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mrs Diana Adams (1357229)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mrs Diana Adams (1357229)

Comment ID DNP-34

Response Date 30/05/24 17:13

Status Processed

Submission Type Web

Version 0.1

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site Plan B Land at Tyndall Farm West

Question 2

Please add your comments below

Over the 24 years I have lived at my present address, the through traffic has obviously increased. The volume in recent years, however, and the current level of new builds in Maldon and the entire Dengie peninsula has and will continue to increase the numbers even further.

The road is narrow, only a single carriage-way and the slightest obstructions cause exceptionally long tail-backs. Cyclists not only take risks by travelling along the A141, but they do also further slow the traffic and most likely cause drivers to take chances to overtake them

The addition of 65 new properties as per Site B will add further traffic that has to travel the entire Danbury length of the A141. There are already bottle-necks at the Tesco Express shop, Eves Corner and more especially right-hand turns at the Co-op. It would surely be more sensible for the extra homes to be built nearer to the A12, where access to the Park and Ride and the A12 itself would be a far shorter distance and alleviate the pressure on the A141 through Danbury.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Agent Mr Trevor Hollinger (873460)

Email Address

Company / Organisation Aquila Developments

Address

Consultee Blenheim Consultancy Services (1355497)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Blenheim Consultancy Services (1355497)

Comment ID DNP-35

Response Date 19/06/24 10:12

Status Processed

Submission Type Web

Version 0.3

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Policy DNP1

Question 2

Please add your comments below

We support the allocation of land at Danecroft, Woodhill Road for circa 14 homes. The site is available for early development and as such can contribute to identified housing need in a flourishing village. It can be noted that substantive proposals have evolved to provide 15 units but since there is sufficient flexibility in the policy to accommodate this it is not considered that change is required

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Agent Mr Trevor Hollinger (873460)

Email Address

Company / Organisation Aquila Developments

Address

Consultee Blenheim Consultancy Services (1355497)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Blenheim Consultancy Services (1355497)

Comment ID DNP-36

Response Date 19/06/24 10:16

Status Processed

Submission Type Web

Version 0.4

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site D: Danecroft, Woodhill Road

Question 2

Please add your comments below

Criterion 3 should not require referral to Natural England since the proposed development at Danecroft is below the 50 unit size threshold which applies in the Danbury Common SSSI Impact Risk Zone. Matters relating to ecology will be appropriately addressed in planning application supporting documentation.

Criterion 6 should not introduce site specific control on height since Document 23 does not support this. Policy DNP4 provides sufficient guidance in this respect

Criterion 8 is unnecessary since it repeats criterion 4

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mrs Jennifer Poel
(1357689)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mrs Jennifer Poel (1357689)

Comment ID DNP-39

Response Date 03/06/24 23:58

Status Processed

Submission Type Web

Version 0.2

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site Plan B Land at Tyndale Farm West

Question 2

Please add your comments below

I am objecting to the proposed development of 65 houses on the land at Tyndale Farm West. The A414 is already a very busy road, at peak times it is overpowered by traffic and comes to a standstill. The volume of traffic has increased over the past few years and more so now and increasingly with the large new housing developments that are springing up in the Maldon area.

This is putting a huge pressure on the A414, increased pollution and traffic danger to local residents and then to add to it with a further development of houses would cause a higher volume of traffic in the surrounding lanes at that end of the village. These lanes are only single track lanes with very few passing areas, there are no footpaths and an increased volume of traffic would pose a great danger to the many people who enjoy taking exercise walking along the lanes, the people who exercise their dogs walking along them and to the adults and children who enjoy cycling along them. The lanes would become 'rat runs' they are not appropriate for a large volume of traffic.

A new development of houses at that end of the village would also greatly increase traffic along the Main Road because, assuming that each house would have at least one, some multiple, car and will be making regular journeys to Chelmsford or the A12.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Dr Anthony Lipscomb (1357458)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Dr Anthony Lipscomb (1357458)

Comment ID DNP-40

Response Date 04/06/24 21:28

Status Processed

Submission Type Web

Version 0.5

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Danbury neighbourhood development plan page 35 .
5. 21. Tyndales farm ,site B

Question 2

Please add your comments below

I strenuously object to the selection of this site ; the contraindications are clearly stated in the plan: comprising loss of agricultural land, proximity to several SSIs , impact on Cherry garden lane, known to be one of the " leafy lanes" named for preservation, and the consequences of major building works then housing literally yards from our kitchen window.

Should this development proceed I would request in the strongest possible way that every effort be made in mitigation of the serious impact which it would have on our family life, living as we do in the position of maximum exposure to the the sights, sounds and smells of major construction. A deep shelter belt would be hugely beneficial both protecting us and our quality of life and adding to the local biodiversity. Clearly it should comprise of appropriate native species of tree shrub and grass thus allowing birds , small mammals and insects to flourish and also the continuance of the de facto public walking path much used my pedestrians,their families and many dog walkers. I have already planted a now mixed native species field hedge around my property which is flourishing.

Comment

Consultee Mrs Jennifer Poel
Email Address (1357689)
Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation
Comment by Mrs Jennifer Poel (1357689)
Comment ID DNP-41
Response Date 04/06/24 21:30
Status Processed
Submission Type Web
Version 0.2

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site Plan B Land at Tyndale Farm West

Question 2

Please add your comments below

I wish to object to the proposal to build 65 new houses on rural land, Tyndale Farm West. This land is good agricultural land and crops have been grown there throughout the sixty years that I have lived in the area, not only is this land important for providing food but by the very fact that it is rural and agricultural, it provides necessary habitat for wildlife, The importance of preserving agricultural land is not only to maintain the very essence of being a 'village' but in these troubled times, when the ability to import food and grain cannot be guaranteed, it becomes all the more essential to be self sufficient in providing foodstuff for the Nation. It is too easy to eat away at a field here and a field there but agricultural land and wildlife habitat should be preserved.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Emilia Ayms (1358025)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Emilia Ayms (1358025)

Comment ID DNP-42

Response Date 05/06/24 12:45

Status Processed

Submission Type Web

Version 0.2

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below 3- Danbury NP Submission Plan

Question 2

Please add your comments below

Unfortunately this is not sustainable, the new developments particularly A & B as proposed have not considered the affect of traffic on the A414. There is many developments further along this road to Maldon, this will increase the traffic immensely too. It is not sustainable to keep developing with the main access to the a414. The GP service would not be able to cope with 100 more households, nor the schools and services. Please consider that building more requires infrastructure in place, where it is not it pushes people further afield meaning more traffic, air pollution and loss of nature and sense of place in a community. The AQMA at Danbury duck pond has only recently been removed, this will come back, if not already with the amount of traffic that passes/ is stationary through the village of late.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mrs Abbie Hodgson (1358410)
Email Address
Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation
Comment by Mrs Abbie Hodgson (1358410)
Comment ID DNP-43
Response Date 06/06/24 18:33
Status Processed
Submission Type Web
Version 0.2

Question 2

Please add your comments below

Runsell Green is already busy the through traffic coming from Maldon etc is ridiculously busy in a morning. There are no crossing or speed cameras to deal with more traffic. The road is dangerous without adding a further 65 homes. Not enough amenities to house the local residents let along more houses.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mrs Sue Lees (1358427)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mrs Sue Lees (1358427)

Comment ID DNP-44

Response Date 07/06/24 10:57

Status Processed

Submission Type Web

Version 0.2

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site B: Land at Tyndales Farm West, pages 34-36

Question 2

Please add your comments below

We are very disappointed to learn that the land at Tyndales Farm West (Area B on Figure 5) is included in the Danbury Neighbourhood Plan, after years of fighting against turning this land into a gravel quarry! As a family we have lived in Barley Mead, Danbury for 32 years now and always enjoyed walking in the field behind our houses, where the proposed 65 new houses are to be built. More recently, over the last 7 years, we have walked our dog in that field every morning and evening, along with a lot of other local dog owners. During Covid, this field was used by a much larger number of villagers for their daily exercise as it so accessible from this side of the village. Unlike the other end of the village, which has access to Danbury Lakes and Danbury Common, we do not have as much open countryside, so cherish this large field near our house, especially the public footpath that goes diagonally across the field which would be in the middle of this new development. Even if a wildlife corridor is built along the public footpath, our dog walks will never be the same again across this beautiful landscape.

The document says that all sites were assessed against criteria, however I suggest the following criteria is not met by this parcel of land:

1. Not cause harm to the environment, including important views, designated open green spaces, valued landscapes, residential amenities or habitats.
2. Keep separation between settlements/parishes.
3. Have a satisfactory highway access.

4. Have a minimal impact on local highway network, having direct access from Priority 1 or Priority 2 Roads.

I believe that building 65 houses on this land will cause considerable harm to the environment, especially impacting the beautiful view across the fields and the large number of wildlife living/visiting these fields, including a large family of local deer, nesting birds, skylarks, small mammals and foxes etc. Please see picture attached of my morning walk today (7th June 2024). [criteria 1]

Also building here will bring the Danbury (Chelmsford) boundary right up to the Maldon boundary, as the "Welcome to Chelmsford City" sign is on the A414, near the far end of where this land starts. So, it must be right up against the Maldon and Woodham Mortimer parish boundaries. [criteria 2]

Additionally, the road access is not great because this will attract at least another 65, but more likely 130+ cars to the village (depending on the number or 2-4 car families). If these additional cars are heading towards Chelmsford or the A12 then that will result in an extra 130+ cars going through the centre of Danbury every morning and evening to work, not to mention children being driven or getting buses to school! Surely with all the additional traffic coming through our little village from the massive developments in Maldon, we should not be increasing this by building on the Maldon side of our village.

I would have thought building on land at the A12 side of the village would have less impact on the considerable amount of traffic going through our village each morning and evening. [criteria 3 and 4]

Adding an extra junction on the A414 will also have a large impact on this already very busy road, causing more tailbacks to the roundabout near the Tin Roof café and beyond! Also, I have concerns about how many cars will turn off at this new junction and divert along Cherry Garden Lane to Hyde Lane, as we already have a considerable number of cars that use Hyde Lane as a 'rat run' in busy periods to avoid the A414 through the centre of Danbury. These cars already speed down the narrow single track Cherry Garden Lane/Hyde Lane roads, even though the speed limit is 30 miles per hour. Thus, having a large impact on these rural characteristic lanes which are valued by the residents as stated in the village questionnaire [Which goes against the Reasoned justification for Site B - 5.23].

Finally, I cannot understand why the Neighbourhood plan is allocating 65% of its housing to this one plot, this seems a bit of an over development, surely this could have been spread more evenly across the village, if not moved to the A12 end of the village. The newer developments at this end of the village, including Barley Mead, Hyde Green, Dilston and The Hawthorns are all much smaller developments, so this new development of 65 houses will be a much larger development by comparison and will definitely damage the country lane feel of the area. Additionally, I feel once this first batch of 65 houses are built, then the rest of this land will be built on, as this will set a precedence for further development at Tyndales Farm.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

If you wish to submit any supporting information, please upload it here [IMG_6269.jpg](#)



Comment

Consultee Mrs Margaret Fursse (1358563)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mrs Margaret Fursse (1358563)

Comment ID DNP-45

Response Date 09/06/24 17:57

Status Processed

Submission Type Web

Version 0.2

Question 2

Please add your comments below

I feel obliged to voice my concerns relating to 65 houses being built on farmland producing food crops wheat, seeds rape & this year barley all a valuable commodity at this worrying time of food crisis around the world. This land is not waste ground but important food producing farmland. Also it will create more traffic through the village & will turn Hyde Lane a narrow winding lane into a rat run. The far reaching views across this field must be preserved.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mr Robert Alcock (1358597)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mr Robert Alcock (1358597)

Comment ID DNP-46

Response Date 10/06/24 11:28

Status Processed

Submission Type Web

Version 0.2

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site D

Question 2

Please add your comments below

Danbury Neighbourhood Plan - Site D: Danecroft, Woodhill Road

Further to the recent meetings and invitations to discuss the neighbourhood plan I write to say that the development of site D will have a significant effect on my property. Whilst as yet I have not seen any specific plans as to the location of the plots or indeed the number of trees and wildlife that may be removed or killed from the site.

Planning permission had been declined on this particular plot some three times before and I cannot see any reason why this should now be removed. Is the site outside the settlement boundary? Is it classed as countryside? The paddocks to either side of Danecroft were SSSI dedicated and were one of the reasons why it has been turned down for development in the past.

Building fourteen houses on the site will change the nature of the area completely from a delightful rural setting to a housing estate and the south facing country views enjoyed from my garden and other gardens further up the road will be destroyed. Regarding the height of the proposed dwellings kindly take note that Danecroft was built slightly over the approved height.

Due to the clay soil in the Danbury area any major building work may also have an effect of the foundations of existing properties and water table in the area.

There are mature oak trees in the north west of the proposed site and possible removal of these would

pose a threat to the ecological balance of the area and impact of a range of wildlife from deer, hedge hogs, bats, newts, badgers and birds. The oak trees are well established and must be protected from removal. There is no way they can be replaced with like for like.

The land is already a natural wild life corridor between the national trust sites. It has a high volume of bat population and flora and fauna movement. To quote your reason justification for site D: 5.33 this is incorrect. Development would destroy the biodiversity that already exists.

The road system already classed as very tired by Highways Department some ten years ago and has limped on. There are already numerous pot holes in the roads that appear to be totally neglected. The roundabout at the junction of Well Lane and Main Road is a cause for concern as drivers ignore the signs advising of the roundabout and do not stop for vehicles turning on the roundabout to Well Lane. Parking of cars and traffic volumes are causing serious issues. The school, nursery and businesses estate on Well Lane are narrowed to one lane due to parking for several hours daily. Penny Royal Lane has parking issues caused by numerous cars parking on both sides of the road and blocking traffic. The National Trust car park on Woodhill Road, Danbury is constantly full leaving vehicles to randomly park all around the area.

Due to the large developments in South Woodham Ferrers, Bicknacre, Maldon and surrounding areas commuters from these properties and existing towns travel through the Main Road, Danbury down to Woodhill Road, Danbury, both roads are in already poor condition. To give access to Woodhill Road Plot D for a further twenty eight vehicles (two per household) will allow vehicles access to this already over congested road and with a blind bend to the right of the access road the development will no doubt cause disruption and accidents. vehicles using Woodhill Road from both directions travel in excess of 40 mph speed limit. The road is a rabbit run for drivers wanting to avoid the A414/Main road Danbury to travel to the park and ride at Sandon or accessing the A12 or getting to Chelmsford. It is therefore deemed an unsafe access onto Woodhill Road.

There has been an increasing volume of cyclists using the roads in Danbury some for on road cycling to places of work, leisure and more and for mud/off roading tracks in the local area.

Regarding Healthcare: the existing Beacon Health Group GP practice has been over capacity for several years now and provides a poor service, the two dental practices in the area are fully booked and not taking NHS patients.

The situation is no better with Education, the primary school in Well Lane appears over capacity and the independent school on Eves Corner drive quite selfishly and perilously.

Food Stores: The Co-Op has a small car park for the number of users and shares the site with the drivers dropping their children at the local independent school and also the vets. Throwing more vehicles on to the main road and waiting for another accident to happen.

Since the plan started to be drawn up many properties have been built in Danbury. There are also plans or projects in development for several thousand houses to be built in North East Chelmsford nullifying the requirement for building further properties in this area.

These are some of the reasons and the lack of infrastructure why I believe that permission should not be granted for any major development in Danbury and particularly Plot D.

Yours sincerely

Mr & Mrs R J Alcock

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mrs Judy Alcock (1358716)
Email Address
Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation
Comment by Mrs Judy Alcock (1358716)
Comment ID DNP-47
Response Date 10/06/24 13:30
Status Processed
Submission Type Web
Version 0.3

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site D: Danecroft, Woodhill Road

Question 2

Please add your comments below

Danbury Neighbourhood Plan - Site D: Danecroft, Woodhill Road

Further to the recent meetings and invitations to discuss the neighbourhood plan I write to say that the development of site D will have a significant effect on my property. Whilst as yet I have not seen any specific plans as to the location of the plots or indeed the number of trees and wildlife that may be removed or killed from the site.

Planning permission had been declined on this particular plot some three times before and I cannot see any reason why this should now be removed. Is the site outside the settlement boundary? Is it classed as countryside? The paddocks to either side of Danecroft were SSSI dedicated and were one of the reasons why it has been turned down for development in the past.

Since the new house was built there has been a steady increase in numbers of insects, invertebrates, mammals and birds.

Slowworms, newts and frogs exist in the undergrowth. Increase in dragonflies, mayfly, moths and butterflies.

Foxes, badgers and hedgehogs have been recorded going through the boundary fences into the paddocks to then pass safely onto further rural space.

.

Building fourteen houses on the site will change the nature of the area completely from a delightful

rural setting to a housing estate and the south facing country views enjoyed from my garden and other gardens further up the road will be destroyed. Regarding the height of the proposed dwellings kindly take note that Danecroft was built slightly over the approved height.

Due to the clay soil in the Danbury area any major building work may also have an effect of the foundations of existing properties and water table in the area.

There are mature oak trees in the north west of the proposed site and possible removal of these would pose a threat to the ecological balance of the area and impact of a range of wildlife from deer, hedge hogs, bats, newts, badgers and birds. The oak trees are well established and must be protected from removal. There is no way they can be replaced with like for like. These trees provide a home for many species.

The land is already a natural wild life corridor between the national trust sites. It has a high volume of bat population and flora and fauna movement. To quote your reason justification for site D: 5.33 this is incorrect. Development would destroy the biodiversity that already exists.

A development for the site was turned down on appeal in 2010 due to "Unacceptable harm to the character and appearance of the countryside, and of the locality, contrary to the policies CP5 and DC2 of the adopted core strategies."

The road system already classed as very tired by Highways Department some ten years ago and has limped on. There are already numerous pot holes in the roads that appear to be totally neglected. The roundabout at the junction of Well Lane and Main Road is a cause for concern as drivers ignore the signs advising of the roundabout and do not stop for vehicles turning on the roundabout to Well Lane. Parking of cars and traffic volumes are causing serious issues. The school, nursery and businesses estate on Well Lane are narrowed to one lane due to parking for several hours daily. Penny Royal Lane has parking issues caused by numerous cars parking on both sides of the road and blocking traffic. The National Trust car park on Woodhill Road, Danbury is constantly full leaving vehicles to randomly park all around the area.

Due to the large developments in South Woodham Ferrers, Bicknacre, Maldon and surrounding areas commuters from these properties and existing towns travel through the Main Road, Danbury down to Woodhill Road, Danbury, both roads are in already poor condition. To give access to Woodhill Road Plot D for a further twenty eight vehicles (two per household) will allow vehicles access to this already over congested road and with a blind bend to the right of the access road the development will no doubt cause disruption and accidents. Vehicles using Woodhill Road from both directions travel in excess of 40 mph speed limit. The road is a rabbit run for drivers wanting to avoid the A414/Main road Danbury to travel to the park and ride at Sandon or accessing the A12 or getting to Chelmsford. It is therefore deemed an unsafe access onto Woodhill Road.

There has been an increasing volume of cyclists using the roads in Danbury some for on road cycling to places of work, leisure and more and for mud/off roading tracks in the local area.

Regarding Healthcare: the existing Beacon Health Group GP practice has been over capacity for several years now and provides a poor service, the two dental practices in the area are fully booked and not taking NHS patients.

The situation is no better with Education, the primary school in Well Lane appears over capacity and the independent school on Eves Corner drive quite selfishly and perilously.

Food Stores: The Co-Op has a small car park for the number of users and shares the site with the drivers dropping their children at the local independent school and also the vets. Throwing more vehicles on to the main road and waiting for another accident to happen.

Since the plan started to be drawn up many properties have been built in Danbury. There are also plans or projects in development for several thousand houses to be built in North East Chelmsford nullifying the requirement for building further properties in this area.

These are some of the reasons and the lack of infrastructure why I believe that permission should not be granted for any major development in Danbury and particularly Plot D.

Yours sincerely

Mrs J Alcock

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

If you wish to submit any supporting information, please upload it here [Oak Tree 5 .jpg](#)

If you wish to submit any supporting information, please upload it here [Oak Tree 2 - Danecroft June 2024.jpg](#)

If you wish to submit any supporting information, please upload it here [Oaktree 3 - Danecroft June 2024.jpg](#)

If you wish to submit any supporting information, please upload it here [Oaktree 4 - Danecroft June 2024.jpg](#)



Comment

Consultee Mr Robert Alcock (1358597)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mr Robert Alcock (1358597)

Comment ID DNP-48

Response Date 10/06/24 13:39

Status Processed

Submission Type Web

Version 0.2

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site D: Danecroft, Woodhill Road

Question 2

Please add your comments below

Please note as mentioned this site has been declined for planning a few time one being APP/W1525/A/10/2126199

Due to unacceptable harm to the character and appearance of the countryside and of the locality, contrary to the policies CP5 and DC2 of the adopted core strategy.

It must also be noted that great crested newts have been found in a pond in the vicinity of the development.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

If you wish to submit any supporting information, please upload it here [Oak Tree 2 - Danecroft June 2024.jpg \(1\)](#)

**If you wish to submit any supporting information,
please upload it here**

[Oak Tree -4 Danecrot June 2024.jpg](#)

**If you wish to submit any supporting information,
please upload it here**

[Oak Tree 5 .jpg \(1\)](#)

**If you wish to submit any supporting information,
please upload it here**

[Oaktree 3 - Danecroft June 2024.jpg \(1\)](#)



Comment

Consultee Isabelle Buckingham (1356836)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Isabelle Buckingham (1356836)

Comment ID DNP-49

Response Date 10/06/24 17:41

Status Processed

Submission Type Web

Version 0.3

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site B: Land at Tyndales Farm West

Question 2

Please add your comments below

This field is right outside my house and is a beautiful field. It has many species of wild life living in it such as deers, badgers and bats. If you develop houses on this field then you would be destroying wildlife and their homes. It is also an amazing field to walk your pets in so if you take this field away a lot of the community will have limited walking spaces. As well as living outside it i know for sure that making these houses on the field is just going to cause mayhem and accident. The main road is already busy enough as it is. The road outside of the houses is also a country road. This will become extremely dangerous as it's extremely tight. This also means that we will also have limited parking spaces. Danbury is also busy enough as it is and can just about cater for the people who live in it. I have had to leave Danbury doctors as it's just to busy so adding more people will absolutely ruin this. It will also be extremely noisy. Living opposite it will mean that the houses around it will be kept awake as it will be extremely loud. Do not ruin this field!

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee	Mr Andy Watts (1358921)
Email Address	
Address	
Event Name	5. Danbury Neighbourhood Plan Reg 16 Consultation
Comment by	Mr Andy Watts (1358921)
Comment ID	DNP-50
Response Date	11/06/24 10:26
Status	Processed
Submission Type	Web
Version	0.3

Question 2

Please add your comments below

This proposed development should never have been incorporated into the Danbury local plan. With no physical boundary outside of the narrow Hyde Lane and busy A414 there is nothing to stop it extending towards Oak Corner and the inevitable joining up with the never-ending march of Maldon. There are plenty of opportunities for smaller developments in and around Danbury without destroying the character of the village which this will ultimately do. Not now perhaps but certainly in the future. I also find it ironic that this development is considered as coming under the framework of Chelmsford City council, who having undertaken a progressive conversion of the county town and my birthplace since the early 1970's into a characterless, lifeless concrete jungle are in no position to advise anyone on what is and what isn't an acceptable development.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Agent Phoebe Conway (1326383)

Email Address

Company / Organisation Marrons Planning

Address

(1327864)

Consultee Martin Grant Homes

Company / Organisation

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Martin Grant Homes (- 1327864)

Comment ID DNP-51

Response Date 07/06/24 16:34

Status Processed

Submission Type Email

Version 0.5

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Policy DNP1: Housing Site Allocations

Question 2

Please add your comments below

2.4 Draft Policy DNP1 sets out a policy response to the Neighbourhood Plan Housing and Development objective:

“To ensure there is a mix of house types, size and high-quality housing provision for all ages, which meets the housing needs of Danbury. It will also be appropriate to the scale and nature of the Parish, with the district and separate identity of Danbury retained. Green energy in new developments will be encouraged”.

3.3 The site is located outside of the Green Belt, the Danbury Commons SSI and the Danbury Conservation Area, and is located entirely within Flood Zone 1.

3.4 Access to the site can be made available immediately via Little Fields (30mph speed limit). The site also has the potential to collaborate effectively with the Neighbourhood Plan Allocation Site A in being accessed via Maldon Road (A414).

3.5 The site is well related to the village, forming a logical next step for the built form, this is justified through the draft allocation of the adjoining Site A within the Neighbourhood Plan. Danbury has been identified within Draft Policy S7, 'Spatial Strategy' as a Key Service Settlement, reflective of its offering of services and facilities which include primary schools, early years and childcare provision, convenience shopping facilities, places of worship, restaurants and public houses, Danbury Leisure Centre and Sports Facilities, a Village Hall and healthcare facilities.

3.6 There are bus stops along Maldon Road which provide regular services to Chelmsford and the local schools. The City of Chelmsford is located approximately 5.5 miles west of the site and offers a much broader range of services and facilities including Supermarkets, a Leisure Centre, a Train Station, a Hospital, to list a few.

3.7 The site was previously assessed as part of the 2023 - 2024 Strategic Housing and Employment Land Availability Assessment (SHELAA) (May 2024) as site reference, 21SHELAA43, 'Land North East of Little Fields, Danbury'. The SHELAA concluded that the site was 'suitable', 'available' and 'achievable' and therefore developable within 5 years, but the site has not been identified as a draft allocation within the Neighbourhood Plan.

3.8 The site was not included within the November 2018 Call for Sites Report nor the March 2022 Sites Selection and Allocation Report which form part of the evidence base of the Neighbourhood Plan, the reasons for the sites exclusion have not been disclosed.

3.9 Given the similarities between the site at Little Fields and Site A, the inclusion of the site at Little Fields as a draft allocation is arguably justifiable as being appropriate for residential development and for draft allocation within the Neighbourhood Plan, as per the justification set out on Page 33 of the Submission Version Danbury Neighbourhood Plan; the two sites are highly comparable with very little variance.

3.10 There is no reason that the site should be excluded from the Neighbourhood Plan, as previously stated in Paragraph 3.12, the inclusion of the site within the Neighbourhood Plan would increase the Parish's current proposed housing provision of 93 dwellings to 123 which would exceed that of the housing requirement set by Local Plan Policy S7, but would eliminate any risk of under delivery and provide a more varied mix of housing in compliance with Draft Neighbourhood Plan Policy DNP2.

3.11 To conclude, the site is a sympathetic and logical extension to Danbury.

The site is under single ownership and has the potential to deliver up to 30 new homes at general village densities immediately adjacent to the village boundary. The site poses a rare opportunity to work collaboratively with Draft Allocation Site A to deliver much needed housing to the Parish and wider City.

3.12 Finally, it should be noted that the site is under the control of Martin Grant Homes, who are a regional, medium sized house builder who pride themselves on delivering high quality homes. Martin Grant Homes continuing to work collaboratively with the surrounding landowners, Chelmsford City Council and Danbury Parish Council to promote and deliver this site effectively and efficiently through the Local Plan Review process. Therefore, the site is considered to be suitable, achievable, and

available now and deliverable within the short term.
(Further covering and background information can be found in the Attachment PID1327864-B).

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

If you wish to submit any supporting information, please upload it here [PID1327864 - A \(Martin Grant Homes\).pdf](#)

If you wish to submit any supporting information, please upload it here [PID1327864 - B \(Martin Grant Homes\).pdf](#)

Comment

Agent Phoebe Conway (1326383)

Email Address

Company / Organisation Marrons Planning

Address

Consultee (1327864)

Company / Organisation Martin Grant Homes

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Martin Grant Homes (- 1327864)

Comment ID DNP-52

Response Date 07/06/24 16:34

Status Processed

Submission Type Email

Version 0.3

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site A: Land at Sandpit Field

Question 2

Please add your comments below

2.19 Site Specific Draft Policy A – Land at Sandpit Field, East of Little Fields, introduces the draft housing allocation for “around 10 new almshouses”, subject to the 9 criteria set out within the Draft Policy. The justification for the sites allocation is largely because of the its location close to the village amenities and facilities and the opportunity to deliver 100% affordable almshouses, which meet a specific criteria specifically for residents of Danbury.

2.20 We support the draft allocation of Site A within the Neighbourhood Plan, but would make comment on Draft Policy A, criteria 1, which states that “main vehicular access to the site will be from Little Fields”. We would comment that the site, ‘Land at Little Fields’ as introduced at Chapter 4 of these Representations presents an excellent opportunity to support the delivery of draft allocation Site A, particularly through working collaboratively to deliver a safe point of access from Little Fields with the appropriate highway mitigation.

2.21 Additionally as highlighted in Chapter 4, the site at Little Fields has the potential to deliver up to 30 residential units, which would provide a safety blanket for the Parish Council in delivering the 100 units as set out within the adopted Local Plan. We would comment that deliverability should be a key consideration in the allocation of sites. It is also important to note that as previously mentioned, the Chelmsford Local Plan Review is currently undergoing Regulation 18 Consultation, within the emerging Plan, the 100 unit requirement remains.

2.22 Danbury should take a pro-active approach to meeting the housing requirement and, in line with the Planning Practice Guidance; shape their community and support new development proposals and meeting future housing need.

Summary

2.23 In summary, the Danbury Neighbourhood Plan fails to meet the basic conditions as set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (as applied to Neighbourhood Plans by section 38A of the Planning and Compulsory Purchase Act 2004).

2.24 Amendments are required to increase the housing provision, secure additional affordable housing and to have proper regard to sites which have been known to be available and overcome significant flaws as a result of an out of date evidence base presented by the site assessment.

(Further covering and background information can be found in the Attachment PID1327864-B).

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

If you wish to submit any supporting information, please upload it here [PID1327864 - A \(Martin Grant Homes\).pdf](#)

If you wish to submit any supporting information, please upload it here [PID1327864 - B \(Martin Grant Homes\).pdf](#)

Comment

Agent Phoebe Conway (1326383)

Email Address

Company / Organisation Marrons Planning

Address

Consultee (1327864)

Company / Organisation Martin Grant Homes

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Martin Grant Homes (- 1327864)

Comment ID DNP-53

Response Date 07/06/24 16:34

Status Processed

Submission Type Email

Version 0.3

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Other: Land at Little Fields, Danbury

Question 2

Please add your comments below

3.1 The site 'Land at Little Fields, Danbury' is located within the eastern region of the village of Danbury and comprises a single agricultural field extending to approximately 1 hectare of greenfield land.

3.2 The site immediately adjoins the settlement boundary and residential built form to the west and north-west, and is bound to the south by the Danbury Neighbourhood Plan Draft Allocation Site A, 'Land at Sand Pit Field, East of Little Fields'. East of the site lie further agricultural fields.

3.3 The site is located outside of the Green Belt, the Danbury Commons SSI and the Danbury Conservation Area, and is located entirely within Flood Zone 1.

3.4 Access to the site can be made available immediately via Little Fields (30mph speed limit). The site also has the potential to collaborate effectively with the Neighbourhood Plan Allocation Site A in being accessed via Maldon Road (A414).

3.5 The site is well related to the village, forming a logical next step for the built form, this is justified through the draft allocation of the adjoining Site A within the Neighbourhood Plan. Danbury has been identified within Draft Policy S7, 'Spatial Strategy' as a Key Service Settlement, reflective of its offering of services and facilities which include primary schools, early years and childcare provision, convenience shopping facilities, places of worship, restaurants and public houses, Danbury Leisure Centre and Sports Facilities, a Village Hall and healthcare facilities.

3.6 There are bus stops along Maldon Road which provide regular services to Chelmsford and the local schools. The City of Chelmsford is located approximately 5.5 miles west of the site and offers a much broader range of services and facilities including Supermarkets, a Leisure Centre, a Train Station, a Hospital, to list a few.

3.7 The site was previously assessed as part of the 2023 - 2024 Strategic Housing and Employment Land Availability Assessment (SHELAA) (May 2024) as site reference, 21SHELAA43, 'Land North East of Little Fields, Danbury'. The SHELAA concluded that the site was 'suitable', 'available' and 'achievable' and therefore developable within 5 years, but the site has not been identified as a draft allocation within the Neighbourhood Plan.

3.8 The site was not included within the November 2018 Call for Sites Report nor the March 2022 Sites Selection and Allocation Report which form part of the evidence base of the Neighbourhood Plan, the reasons for the sites exclusion have not been disclosed.

3.9 Given the similarities between the site at Little Fields and Site A, the inclusion of the site at Little Fields as a draft allocation is arguably justifiable as being appropriate for residential development and for draft allocation within the Neighbourhood Plan, as per the justification set out on Page 33 of the Submission Version Danbury Neighbourhood Plan; the two sites are highly comparable with very little variance.

3.10 There is no reason that the site should be excluded from the Neighbourhood Plan, as previously stated in Paragraph 3.12, the inclusion of the site within the Neighbourhood Plan would increase the Parish's current proposed housing provision of 93 dwellings to 123 which would exceed that of the housing requirement set by Local Plan Policy S7, but would eliminate any risk of under delivery and provide a more varied mix of housing in compliance with Draft Neighbourhood Plan Policy DNP2.

3.11 To conclude, the site is a sympathetic and logical extension to Danbury.

The site is under single ownership and has the potential to deliver up to 30 new homes at general village densities immediately adjacent to the village boundary. The site poses a rare opportunity to work collaboratively with Draft Allocation Site A to deliver much needed housing to the Parish and wider City.

3.12 Finally, it should be noted that the site is under the control of Martin Grant Homes, who are a regional, medium sized house builder who pride themselves on delivering high quality homes. Martin Grant Homes continuing to work collaboratively with the surrounding landowners, Chelmsford City Council and Danbury Parish Council to promote and deliver this site effectively and efficiently through the Local Plan Review process. Therefore, the site is considered to be suitable, achievable, and

available now and deliverable within the short term.
(Further covering and background information can be found in the Attachment PID1327864-B).

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

If you wish to submit any supporting information, please upload it here [PID1327864 - A \(Martin Grant Homes\).pdf](#)

If you wish to submit any supporting information, please upload it here [PID1327864 - B \(Martin Grant Homes\).pdf](#)



Consultation on Danbury Draft Neighbourhood Plan

PAPER COMMENTS FORM

This form has three parts:

- Part A – Consultation Details
- Part B – Your Contact Details
- Part C – Your Comments on the Draft Neighbourhood Plan

Part A – Consultation Details

Chelmsford City Council is consulting on the following:

- Danbury Neighbourhood Plan

How to comment

You can read and comment on the Danbury Plan on the City Council's Consultation Portal at www.chelmsford.gov.uk/planningpolicyconsult. This is a simple way of making your comments, and you can sign up to be notified about future planning policy consultations.

Alternatively, comments can be made using this form and returned by:

- Email - planning.policy@chelmsford.gov.uk
- Post - Spatial Planning Services, Chelmsford City Council, Civic Centre, Duke Street, Chelmsford, CM1 1JE

For further information about how the Consultation Portal works, read our Consultation Portal User Guide at: www.chelmsford.gov.uk/lp-portal-guide.

If you need help to make your comments, please call our Helpline on 01245 606330, or e-mail planning.policy@chelmsford.gov.uk

Closing date for comments

Please return this form by 4.00pm on Wednesday 19 June 2024.

Please note that comments made verbally or anonymously cannot be accepted.

For further information about the Danbury Plan consultation, please read the Consultation Guidance Note available on this page: www.chelmsford.gov.uk/danburyplan

How your comments will be used

The Council will acknowledge receipt of your comments and fully consider them, although we will not enter into individual correspondence.

All duly-made comments will be published on the Council's Consultation Portal in accordance with the General Data Protection Regulations.

Section 149 of the Equality Act 2010 requires that the Council should avoid any form of discrimination and also foster good relations between different ethnic groups. Comments which are deemed to be discriminatory will be inadmissible and will not be accepted.

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Chelmsford City Council is a Data Controller for the purposes of data protection legislation. All personal information is held and processed in accordance with this. Please refer to our Privacy Notices published on our website at www.chelmsford.gov.uk/privacy for details. Please contact us if you need the privacy notice in an alternative format.

Part B – Your Contact Details

Personal details

Title

First Name

Last Name

Organisation (if you are making comments on behalf of an organisation)

Martin Grant Homes

Address

.....

.....

.....

Postcode

Telephone number

E-mail address

Consultation ID (if known) 1327864

Signature

Date

Agent details (if applicable)

Title

First Name Phoebe

Last Name Conway

Organisation (if you are making comments on behalf of an organisation)

Marrons

Consultation ID (if known)

Signature Phoebe Conway

Date 7th June 2024

Part C – Your comments on the Danbury Plan

Please indicate clearly which paragraph/figure/appendix number your comments relate to – without this your comment cannot be considered.

If you wish to comment on more than one paragraph/figure/appendix number, please complete a continuation sheet for each one.

You may find it useful to refer to the Consultation Guidance Notes available on this page: www.chelmsford.gov.uk/danburyplan

Danbury Plan	Paragraph/figure/appendix number:	Draft Policy DNP1 – Housing Allocations
Your Comment:	Please see accompanying written Representations.	

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan?

Yes

No

Please complete a continuation sheet if you wish to comment on more than one Paragraph/figure/appendix number.

Any comments received after 4.00pm on Wednesday 19 June 2024 cannot be accepted.

If you wish to submit any supporting information, please ensure they contain no signatures, e-mail addresses or personal postal addresses.

This paper comments form can be made available in alternative formats such as large print, and other languages. Please call (01245) 606330 or email planning.policy@chelmsford.gov.uk.

Thank you for taking the time to submit your comments.



Consultation on Danbury Draft Neighbourhood Plan

CONTINUATION SHEET

Name: Phoebe Conway	Postcode: NG2 3DQ
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- Please indicate clearly which paragraph/figure/appendix number your comments relate to – without this your comment cannot be considered
- If you wish to submit a comment on more than one paragraph/figure/appendix number, please complete a continuation sheet for each one
- You may find it useful to refer to the Consultation Guidance Notes available on this page: www.chelmsford.gov.uk/danburyplan

Danbury Plan	Paragraph/figure/appendix number:	Site Specific Draft Policy A – Land at Sandpit Field, East of Little Fields.
Your Comment:	Please see accompanying written Representations.	

Please complete a continuation sheet if you wish to comment on more than one Paragraph/figure/appendix number.

Any comments received after 4.00pm on Wednesday 19 June 2024 cannot be accepted.

If you wish to submit any supporting information, please ensure they contain no signatures, e-mail addresses or personal postal addresses.

This paper comments form can be made available in alternative formats such as large print, and other languages. Please call (01245) 606330 or email planning.policy@chelmsford.gov.uk.

Thank you for taking the time to submit your comments.

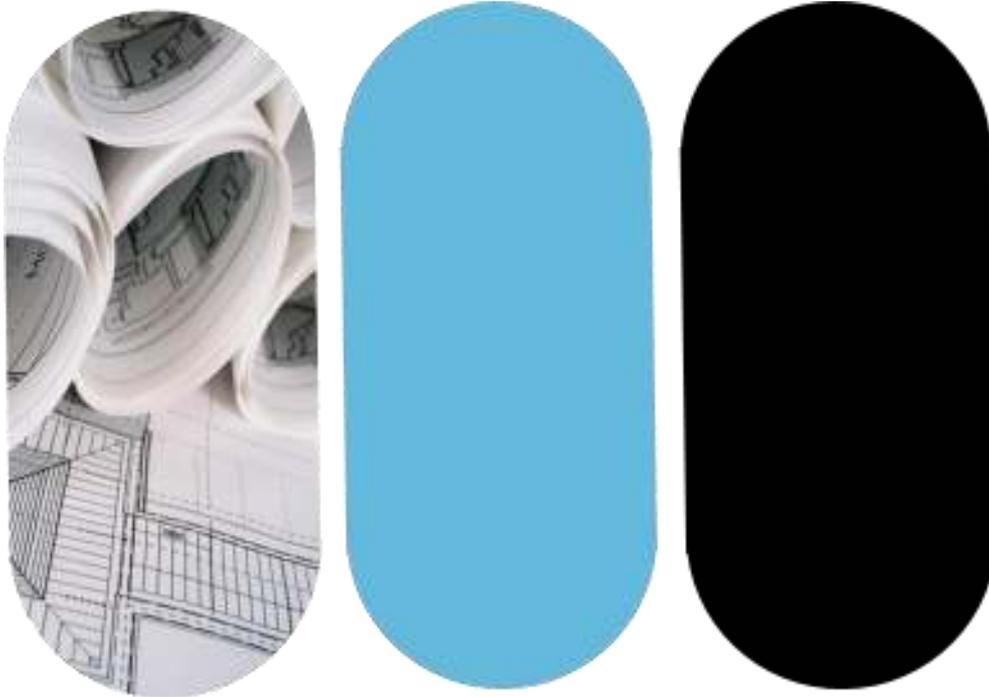


 Part of Shakespeare Martineau

Representations in Respect of the Danbury Neighbourhood Plan 2023 – 2036 Consultation (Regulation 16)

June 2024

On behalf of Martin Grant Homes Limited



Waterfront House, Waterfront Plaza, 35 Station Street, Nottingham, NG2 3DQ
www.marrons.co.uk



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1. Introduction

1.1 These Representations are made on behalf of our client, Martin Grant Homes in respect of their interests at Land at Little Fields, Danbury ('the site') and respond to the Danbury Neighbourhood Plan 2023 – 2036 (Regulation 16) Public Consultation.

1.2 These Representations provide our client's views in respect of the Danbury Neighbourhood Plan Submission Version with a particular focus on:

- Draft Policy DNP1 – Housing Site Allocations; and
- Site Specific Draft Policy A – Land at Sandpit Field, East of Little Fields.

These Representations also confirm our ongoing support for the promotion and development of the aforementioned site and outline the extent to which this site accords with, and reinforces, both Danbury Parish Council's and Chelmsford City Council's emerging spatial strategy and wider aspirations to deliver sustainable development.



Planning Policy Context

- 1.3 Paragraph 13 of the September 2023 NPPF states that, “*Neighbourhood Plans should support the delivery of strategic policies contained in Local Plans or Spatial Development Strategies; and should shape and direct development that is outside of these strategic policies*”.
- 1.4 The Development Plan for Danbury is the Chelmsford Local Plan, adopted in May 2020. The adopted local plan sets out the Council’s planning strategy for the City up to 2036. The Neighbourhood Plan covers the same plan period to 2036.
- 1.5 However, Chelmsford City Council is currently preparing a replacement for the Chelmsford Local Plan 2013 – 2036 and has published the Preferred Options (Regulation 18) Consultation and that document is available for comment across the same period as the Danbury Neighbourhood Plan consultation.
- 1.6 Paragraph 16 of the NPPF says that, “*plans should:*
- a. *Be prepared with the objective of contributing to the achievement of sustainable development;*
 - b. *Be prepared positively, in a way that is aspirational but deliverable;*
 - c. *Be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;*
 - d. *Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;*
 - e. *Be accessible through the use of digital tools to assist public involvement and policy presentation; and*



- f. *Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area”.*

1.7 Paragraph 37 explains that “*Neighbourhood Plans must meet certain ‘basic conditions’ and other legal requirements before they can come into force. These are tested through an independent examination before the neighbourhood plan may proceed to referendum*”.

1.8 National Planning Policy Guidance sets out seven ‘basic conditions’ (Paragraph: 065 Reference ID: 41-065-20140306)::

- a. Having regard to National Policies and Advice contained in guidance issued by the Secretary of State;
- b. Having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses;
- c. Having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area;
- d. The making of the Neighbourhood Plan contributes to the achievement of sustainable development;
- e. The making of the Neighbourhood Plan is in general conformity with the strategic policies contained in the Development Plan;
- f. The making of the Neighbourhood Plan does not breach, and is otherwise compatible with, EU obligations; and
- g. Prescribed conditions are met in relation to the Neighbourhood Plan and prescribed matter have been



complied with in connection with the proposal for the
Neighbourhood Plan.

- 1.9 These Representations are intended to help shape the Neighbourhood Plan and ensure it meets the basic conditions as set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (as applied to Neighbourhood Plans by section 38A of the Planning and Compulsory Purchase Act 2004).



2. Comments on the Danbury Neighbourhood Plan Submission Version

2.1 As per national guidance and legislation, Neighbourhood Plans must be in general conformity with the strategic policies within the Development Plan. As mentioned, the Development Plan for Danbury is the Chelmsford Local Plan, adopted in May 2020 and providing a strategy to 2036.

2.2 The Neighbourhood Plan responds to the following policies from the adopted Local Plan:

- Strategic Policy S7 – The Spatial Strategy;
- Strategic Growth Site Policy 13: Danbury; and
- Strategic Policy S3 – Conserving and Enhancing the Historic Environment.

2.3 The Submission Version Danbury Neighbourhood Plan sets out policies for the village for the plan period of 2023 – 2036, responding to the above policy framework.

Draft Policy DNP1 – Housing Site Allocations

2.4 Draft Policy DNP1 sets out a policy response to the Neighbourhood Plan Housing and Development objective:

“To ensure there is a mix of house types, size and high-quality housing provision for all ages, which meets the housing needs of Danbury. It will also be appropriate to the scale and nature of the Parish, with the district and separate identity of Danbury retained. Green energy in new developments will be encouraged”.

2.5 The Neighbourhood Plan explains that *“Danbury has been allocated*



around 100 new homes from the Chelmsford Local Plan 2020, to be accommodated within or adjoining the Defined Settlement Boundary” [emphasis added]. Policy SP7 of the adopted Local Plan specifically says that “*Danbury has been allocated 100 new homes from the Chelmsford Local Plan 2020...*”. Although housing figures in plans are not to be taken as maximum figures under the national objective to boost significantly the supply of homes, it is important to note that the figure of 100 homes identified by Strategic Policy S7 is not ‘around’ (and nothing in the wording indicates it should be taken to be so) nor is it appropriate to undershoot through the plans delivery – as that would mean the plan is not meeting the needs for development.

- 2.6 The Plan has identified five allocations within Policy DNP1 with a combined development potential of 93 dwellings. This is 7 dwellings below the 100 dwelling requirement contained in Strategic Policy S7 of the Chelmsford Local Plan. Policy DNP1 (2) notes that the “*balance of the Local Plan housing requirement may come forward as windfall development on smaller sites and will be determined against the policies in the development plan.*” This provides no certainty that the necessary 100 dwellings will be delivered within the plan period and is not considered to be positively prepared, in line with National Planning Policy Framework (NPPF) paragraph 35, nor consistent with Strategic Policy S7.
- 2.7 The Parish Council has been working on its Neighbourhood Plan for a number of years with a Call for Sites exercise held in 2017 and, subsequently, a Call for Sites Assessment published in November 2018.
- 2.8 In September 2022, Martin Grant Homes notified the Parish Council that the site had not been considered through the Call for Sites Assessment and confirmed that the Land at Little Fields was available.
- 2.9 A Sites Selection and Allocation Report (dated March 2022), was subsequently published by the Parish Council, confirming that no



additional sites had been considered further to the original 21 sites submitted to the call for sites exercise in 2017.

- 2.10 Martin Grant Homes had reminded the Parish Council of the guidance for plan making (all plans, at both the local and neighbourhood level) in the national planning policy framework (paragraph 31) which says:

“The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals [emphasis added]”.

- 2.11 That same guidance is important to the making of a Neighbourhood Plan given the basis condition to have regard to the national policies and advice contained in guidance issued by the Secretary of State. The approach taken in the Neighbourhood Plan is flawed because of the failure to consider up-to-date evidence comprising alternative sites outside of those submitted as part of original call for sites exercise (in 2017 – some 7 years ago).

- 2.12 The Parish Council had adequate time to undertake a further assessment as part of the development of the plan and the length of time that has passed since they were notified in September 2022 has only compounded that failing and the conflict with national policy.

Affordable Housing

- 2.13 The Neighbourhood Plan Housing and Development objective seeks to ensure there is a mix of house types, size and high-quality housing provision for all ages, which meets the housing needs of Danbury [emphasis added]. We note that a subtle change in direction has been made in the policy set for the Neighbourhood Plan between the Regulation 14 pre-submission version and that presented at Submission



under Regulation 16.

- 2.14 The Regulation 14 Neighbourhood Plan recognised the undersupply of affordable housing as a key issue for the Plan to contend with (paragraph 3.6 of the Regulation 14 Neighbourhood Plan). Policy DNP2 of the Regulation 14 Neighbourhood Plan responded to that framework by requiring 35% of homes on developments of ten or more homes to comprise affordable housing.
- 2.15 The Regulation 16 Neighbourhood Plan continues to recognise the undersupply of affordable housing as a key issue for the Plan to contend with (paragraph 3.6 of the Regulation 16 Neighbourhood Plan) but now contains a much modified version of Policy DNP2 which makes no provision in respect of affordable housing.
- 2.16 Against the above context, it is important to recognise the evidence presented in the Danbury Housing Needs Assessment (HNA) (2020). The HNA identifies a housing need of 95 affordable home ownership dwellings and 51 affordable rent dwellings within the plan period. This amounts to a need for 146 affordable homes in the 2021-36 period.
- 2.17 Even if c.35% of the plans provision for 93 homes were to be affordable it is patently obvious that this will be a very significant shortfall when considered in light of the affordable housing need in Danbury.
- 2.18 In our view, additional allocations should be sought through a further site assessment exercise. The identification of additional allocations would ensure that an increased number of affordable properties could be delivered and a fresh assessment would also remedy the failing in the plan preparation to take account of up to date evidence and allow for sites not previously assessed appropriately.



Site Specific Draft Policy A – Land at Sandpit Field, East of Little Fields

- 2.19 Site Specific Draft Policy A – Land at Sandpit Field, East of Little Fields, introduces the draft housing allocation for “*around 10 new almshouses*”, subject to the 9 criteria set out within the Draft Policy. The justification for the sites allocation is largely because of the its location close to the village amenities and facilities and the opportunity to deliver 100% affordable almshouses, which meet a specific criteria specifically for residents of Danbury.
- 2.20 We support the draft allocation of Site A within the Neighbourhood Plan, but would make comment on Draft Policy A, criteria 1, which states that “*main vehicular access to the site will be from Little Fields*”. We would comment that the site, ‘Land at Little Fields’ as introduced at Chapter 4 of these Representations presents an excellent opportunity to support the delivery of draft allocation Site A, particularly through working collaboratively to deliver a safe point of access from Little Fields with the appropriate highway mitigation.
- 2.21 Additionally as highlighted in Chapter 4, the site at Little Fields has the potential to deliver up to 30 residential units, which would provide a safety blanket for the Parish Council in delivering the 100 units as set out within the adopted Local Plan. We would comment that deliverability should be a key consideration in the allocation of sites. It is also important to note that as previously mentioned, the Chelmsford Local Plan Review is currently undergoing Regulation 18 Consultation, within the emerging Plan, the 100 unit requirement remains.
- 2.22 Danbury should take a pro-active approach to meeting the housing requirement and, in line with the Planning Practice Guidance; shape their community and support new development proposals and meeting future



housing need¹.

Summary

- 2.23 In summary, the Danbury Neighbourhood Plan fails to meet the basic conditions as set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (as applied to Neighbourhood Plans by section 38A of the Planning and Compulsory Purchase Act 2004).
- 2.24 Amendments are required to increase the housing provision, secure additional affordable housing and to have proper regard to sites which have been known to be available and overcome significant flaws as a result of an out of date evidence base presented by the site assessment.

¹ PPG Paragraph: 003 Reference ID: 41-003-20190509



3. Land at Little Fields, Danbury

- 3.1 The site 'Land at Little Fields, Danbury' is located within the eastern region of the village of Danbury and comprises a single agricultural field extending to approximately 1 hectare of greenfield land.
- 3.2 The site immediately adjoins the settlement boundary and residential built form to the west and north-west, and is bound to the south by the Danbury Neighbourhood Plan Draft Allocation Site A, 'Land at Sand Pit Field, East of Little Fields'. East of the site lie further agricultural fields.
- 3.3 The site is located outside of the Green Belt, the Danbury Commons SSI and the Danbury Conservation Area, and is located entirely within Flood Zone 1.
- 3.4 Access to the site can be made available immediately via Little Fields (30mph speed limit). The site also has the potential to collaborate effectively with the Neighbourhood Plan Allocation Site A in being accessed via Maldon Road (A414).
- 3.5 The site is well related to the village, forming a logical next step for the built form, this is justified through the draft allocation of the adjoining Site A within the Neighbourhood Plan. Danbury has been identified within Draft Policy S7, 'Spatial Strategy' as a Key Service Settlement, reflective of its offering of services and facilities which include primary schools, early years and childcare provision, convenience shopping facilities, places of worship, restaurants and public houses, Danbury Leisure Centre and Sports Facilities, a Village Hall and healthcare facilities.
- 3.6 There are bus stops along Maldon Road which provide regular services to Chelmsford and the local schools. The City of Chelmsford is located approximately 5.5miles west of the site and offers a much broader range of services and facilities including Supermarkets, a Leisure Centre, a Train Station, a Hospital, to list a few.



- 3.7 The site was previously assessed as part of the 2023 - 2024 Strategic Housing and Employment Land Availability Assessment (SHELAA) (May 2024) as site reference, 21SHELAA43, 'Land North East of Little Fields, Danbury'. The SHELAA concluded that the site was 'suitable', 'available' and 'achievable' and therefore developable within 5 years, but the site has not been identified as a draft allocation within the Neighbourhood Plan.
- 3.8 The site was not included within the November 2018 Call for Sites Report nor the March 2022 Sites Selection and Allocation Report which form part of the evidence base of the Neighbourhood Plan, the reasons for the sites exclusion have not been disclosed.
- 3.9 Given the similarities between the site at Little Fields and Site A, the inclusion of the site at Little Fields as a draft allocation is arguably justifiable as being appropriate for residential development and for draft allocation within the Neighbourhood Plan, as per the justification set out on Page 33 of the Submission Version Danbury Neighbourhood Plan; the two sites are highly comparable with very little variance.
- 3.10 There is no reason that the site should be excluded from the Neighbourhood Plan, as previously stated in Paragraph 3.12, the inclusion of the site within the Neighbourhood Plan would increase the Parish's current proposed housing provision of 93 dwellings to 123 which would exceed that of the housing requirement set by Local Plan Policy S7, but would eliminate any risk of under delivery and provide a more varied mix of housing in compliance with Draft Neighbourhood Plan Policy DNP2.
- 3.11 To conclude, the site is a sympathetic and logical extension to Danbury. The site is under single ownership and has the potential to deliver up to 30 new homes at general village densities immediately adjacent to the village boundary. The site poses a rare opportunity to work collaboratively with Draft Allocation Site A to deliver much needed



housing to the Parish and wider City.

- 3.12 Finally, it should be noted that the site is under the control of Martin Grant Homes, who are a regional, medium sized house builder who pride themselves on delivering high quality homes. Martin Grant Homes continuing to work collaboratively with the surrounding landowners, Chelmsford City Council and Danbury Parish Council to promote and deliver this site effectively and efficiently through the Local Plan Review process. Therefore, the site is considered to be suitable, achievable, and available now and deliverable within the short term.



Appendix One –
Site Location Plan



Comment

Agent Mr Trevor Hollinger (873460)

Email Address

Company / Organisation Aquila Developments

Address

Consultee Blenheim Consultancy Services (1355497)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Blenheim Consultancy Services (1355497)

Comment ID DNP-55

Response Date 19/06/24 10:20

Status Processed

Submission Type Web

Version 0.4

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Policy DNP9

Question 2

Please add your comments below

There is no justification for the 10 unit threshold in this policy or the involvement of Natural England in a mitigation strategy

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Jacqui George (1359111)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16
Consultation

Comment by Jacqui George (1359111)

Comment ID DNP-56

Response Date 12/06/24 14:05

Status Processed

Submission Type Web

Version 0.1

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site A

Question 2

Please add your comments below

Site A plans state access will be via Littlefields which cannot happen as that land is privately owned. If it were to go ahead would increase pressure on the already busy A414 due to the amount of increased traffic with the massive amount of new housing being built in Maldon. The proposed access is via that strip with the gate but the land all the way up to the road is privately owned so cannot happen.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes



Comment

Consultee Mrs Jane Pace
(1359144)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mrs Jane Pace (1359144)

Comment ID DNP-57

Response Date 12/06/24 15:36

Status Processed

Submission Type Web

Version 0.2

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below D14 Danecroft

Question 2

Please add your comments below

We wish to object strongly to the proposed construction of 14 properties on Danecroft especially as in 2010 permission was refused for four detached houses on the land (10/00102?OUT}. At the time Danbury Parish Council cited the the following reasons for objecting -
Creeping urbanisation would detract from the character of the area
Loss of habitat would mean adverse effect on wildlife
Loss of visual amenity & privacy off neighbouring residents
Soakaway inadequate leading to flooding especially if trees are removed
Increase traffic at junction - proposal 10/00103/FUL will not solve the problems
Danecroft is adjacent to the conservation area of Danbury Common
To now consider building 14 properties on the site is untenable. Assuming each house has two cars plus factoring deliveries & visitors there could be at least 40-50 vehicles every day which would mean over 100 vehicles using the narrow access drive, often with vehicles attempting to go both ways along the access drive. It is already difficult to turn in and out of the access drive which is situated just off a bend with limited visibility into Woodhill Road.
On a personal level we have had a low wall knocked down on a couple of occasions by vans delivering to Danecroft plus delivery drivers & visitors are constantly using our drive to turn round.
Jane & David Pace

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mr Chris Higgins (1359164)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mr Chris Higgins (1359164)

Comment ID DNP-58

Response Date 12/06/24 16:30

Status Processed

Submission Type Web

Version 0.1

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site Plan B Land at Tyndale Farm

Question 2

Please add your comments below

I would like to object to the proposal to build 65 new houses at Tyndales Farm West.

Building on green sites, once gone it is gone forever. Brown sites should be used as preached to the population by numerous Government's for decades.

The loss of animal habitat. Once the building work starts it disturbs the ecological balance in the surrounding area forever! Back gardens are not the same as open farmland, especially to the larger animals and the wild plants that grow alongside the field boundaries.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mr Chris Higgins (1359164)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mr Chris Higgins (1359164)

Comment ID DNP-59

Response Date 12/06/24 16:46

Status Processed

Submission Type Web

Version 0.1

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site Plan B at Tynedale Farm West

Question 2

Please add your comments below

I would like to object to the proposal to build 65 new houses at Tyndales Farm West.

Traffic increase in the area will be a disaster not only the immediate area but for the whole of Danbury. Traffic is already very heavy between Maldon and junction 18 of the A12. Adding more homes along side the A414 will encourage the drivers to use the narrow lanes to beat the delays, this will destroy the mainly peaceful countryside and ruin the lives of the residence of those areas.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mr Chris Higgins (1359164)
Email Address
Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation
Comment by Mr Chris Higgins (1359164)
Comment ID DNP-60
Response Date 12/06/24 16:48
Status Processed
Submission Type Web
Version 0.1

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site Plan B Land at Tynedale Farm West

Question 2

Please add your comments below

I would like to object to the proposal to build 65 new houses at Tyndales Farm West.

Noise from the site will be very distressing for anyone within a large area while the building work is ongoing. Heavy machinery, lorries taking away the earthworks, lorries bring equipment and materials to the site, tradesmen's vans, etc, will all add the congestion and pollution. All this isn't good for animal or human welfare, mentally or physically.

Comment

Consultee Mrs Barbara Hallett (1359169)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mrs Barbara Hallett (1359169)

Comment ID DNP-61

Response Date 12/06/24 17:47

Status Processed

Submission Type Web

Version 0.1

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Page 282/283 D7 Land at Tyndales Farm West

Question 2

Please add your comments below

*I am concerned about the access plans for this site particularly how it will affect the appearance of, and traffic in, the east end of Cherry Garden Lane. This is a very narrow lane with a rural appearance especially at the junction with the A414 and its view across the agricultural field and footpath to the right. If a new road is put in to join with the proposed housing estate this will be lost and I am not convinced any replacement landscaping there will restore this. If this did go ahead and a new access road was put in further down the road would traffic from the estate be allowed to use Cherry Garden Lane including the very dangerous junction at Hyde Lane?

* The field has always been in agricultural use with good crops . The loss of this agricultural Land is also of great concern.

* The footpath which runs through this land is used a great deal by walkers on a regular basis and is a considerable source of recreation to residents at this end of Danbury and for visiting hikers. Although in previous plans it was proposed to keep a footpath this would not give the same sense of freedom and being out in the countryside as the rural aspect does now.

* The lovely view across from Cherry Garden Lane would be destroyed particularly for the residents in Little Heyrons , Winterberry , The Cottage and Holly Cottage.

Question 3 **Do you wish to be notified of the decision on the Danbury Neighbourhood Plan?** Yes

Comment

Consultee Mr David Hallett (1359172)
Email Address
Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation
Comment by Mr David Hallett (1359172)
Comment ID DNP-62
Response Date 12/06/24 18:01
Status Processed
Submission Type Web
Version 0.1

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Pages 282- 284, specifically site 2-D7, land at Tyndales Farm West

Question 2

Please add your comments below

Most of the new housing proposed in this plan is to go on the above site, effectively a large new housing estate.. it is at the Maldon end of the village so most residents of Danbury will not need to see it (I am guessing that most journeys from Danbury are in the Chelmsford direction)..

The development would be on prime agricultural land currently in use to grow crops, hardly encourage food security. It would also partly affect a footpath over the field popular with dog walkers and others. 63 houses would probably bring with them 100 or so cars to clog up the already busy A414 through the village and nobody is going to use a cycle except for recreation, only athletes would be regularly able to cycle up Bell Hill and if they did they would badly hold up motor traffic..

I live in Cherry Garden Lane, currently this is a single- track road at the end which would adjoin the estate. I can foresee the Lane being used as a rat run or pressure to widen it causing loss both of parts of gardens and loss of its rustic character..

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee	Mr Kevin Fraser (311148)
Email Address	
Company / Organisation	Essex County Council
Address	County Hall Chelmsford CM1 1LX
Event Name	5. Danbury Neighbourhood Plan Reg 16 Consultation
Comment by	Essex County Council (Mr Kevin Fraser - 311148)
Comment ID	DNP-63
Response Date	13/06/24 09:08
Status	Processed
Submission Type	Email
Version	0.3

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below General

Question 2

Please add your comments below

Please see attached representation

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

If you wish to submit any supporting information, please upload it here [ECCresponsetoDanburyNPReg16ResponseSubmit.pdf](#)

19th June 2024

Spatial Planning
Essex County Council
County Hall
Market Road
Chelmsford, CM1 1QH

Planning Policy Team
Spatial Planning Services
Chelmsford City Council

By email: planning.policy@chelmsford.gov.uk

Dear Sir/Madam,

RE: DANBURY NEIGHBOURHOOD PLAN (REGULATION 16) – 2023 – 2036

Thank you for consulting Essex County Council (ECC) on the Danbury Neighbourhood Plan (the Plan). ECC provides the following response, which reflects ECC's role as the Minerals and Waste Planning Authority, the Highway Authority, the Transportation Authority, the lead authority for education (including early years and childcare), the Lead Local Flood Authority and our responsibility for providing and delivering adult social care (ASC) and public health services. Comments also reflect ECCs lead role covering climate change and net zero carbon and green and blue infrastructure.

The ECC response outlines where changes need to be made to ensure ECC can deliver its statutory responsibilities and recommends other changes for your consideration. ECC notes that the Plan allocates five housing sites for around 93 homes as required in the adopted Chelmsford Local Plan, Strategic Growth Site Policy 13 – Danbury (around 100 homes), which has been carried over into the Preferred Options Local Plan currently subject to public consultation. The remainder will come from 'windfall' development.

Everyone's Essex

Everyone's Essex, ECC's organisation strategy, sets out four strategic areas and 20 commitments. One strategic aim seeks a strong, inclusive and sustainable economy. This strategic aim includes a commitment to deliver and maintain high quality infrastructure to support a growing economy and the delivery of new homes and communities. Achieving this requires us to ensure that the development, planning and infrastructure delivery across the administrative county, can be aligned and support the Local and Neighbourhood Plans that are being prepared across the county, at its boundaries and beyond. This is to ensure that the planned growth includes provision for the delivery of ECC's infrastructure and services commensurate with the growth being planned, and to support existing and future residents and businesses.

The response that follows reflects the order of the Plan.

Chapter 1 - Introduction

ECC, as the Mineral and Waste Planning Authority (MWPA), welcome reference to the MLP and WLP as relevant planning policy documents in paragraph 1.13.

For information, a MLP Review has commenced to extend the plan period from 2029 to 2040. A second Regulation 18 public consultation was subject to public consultation until 9 April 2024. A further extension to the consultation is being undertaken until 24 July 2024 due to the unintentional omission of a site. Following this consultation, the following stages could include:

- a more detailed technical assessment on candidate sites in light of comments received; and
- moving towards selecting Preferred Site allocations to inform a further consultation (Regulation 19 – Pre-Submission), which may take place late 2024 or early 2025.

Within the Plan area there are Mineral Consultation Areas (MCAs) in relation to the Royal Oak (mineral extraction) and St Cleres Hall Pit (winning and working of mineral and subsequent restoration of the site). These areas are subject to Policy 8 of the MLP which establishes MCAs within and up to 250m from each safeguarded permitted minerals development and Preferred and Reserve Site allocation as shown on the Policies Map of the MLP. ECC must be consulted on all applications for non-minerals development proposed within these areas.

Chapter 4 - Vision and Objectives

Objectives

ECC recommend the 'Heritage' objective is amended to refer to the contribution made by the setting of heritage assets consistent with National Planning Policy Framework (NPPF), paragraph 194 and Section 8 – Heritage Assets. Reference to non-designated incorporates archaeological features.

Conserve and where possible enhance Danbury's heritage assets and their setting features which contribute to the village.

This change would also be consistent with the results of the residents questionnaires to support the Danbury Design Guide, as outlined in the Introduction (page 3) of this document, bullet 2 which states a key desire of residents is to:

- *Conserve and protect heritage assets and their settings*

Chapter 5 - Housing and Development

Policy DNP1: Housing Site Allocations

ECC recommend Criterion 2 also makes reference to new development being required to have regard to the [Essex Design Guide \(EDG\)](#) as follows:

3. *All proposals for new housing development shall have regard to the guidance contained in the Danbury Design Guide, Essex Design Guide and satisfy all relevant policies in the Chelmsford Local Plan.*

Site Specific Policy C: Ex Play Area. South of Jubilee Rise (Area C on Figure 4)

Amend the first sentence to read:

Land at Ex Play Area, South of Jubilee Rise is allocated for around one building accommodating either 2 new homes or 4 one-bedroom apartments. subject to applicable policies DNP1 to DNP23, with the following additional criteria being satisfied:

Policy DNP3: Sustainable Housing Design

ECC strongly support developments which seek higher requirements for new homes than the requirement to be in accordance with Building Regulations and go beyond Future Homes Standard (FHS).

ECC has recently published a number of policy and evidence base documents to support emerging Local Plans and the determination of planning applications, which can be viewed here including:

- [Essex Open Legal Advice – Energy policy and Building Regulations](#) (Estelle Dehon KC, Cornerstone Barristers, 25 February 2024)
- [Essex Net Zero Policy Study \(Reports 1 and 2\)](#) (Introba, Etude, Currie & Brown, July 2023)
- [‘Net Zero Carbon Viability and Toolkit Study’ \(Report of Findings - August 2022\)](#) prepared by Three Dragons, Qoda and Ward Williams Associates.
- [The Planning Policy Position for Net Zero Carbon Development Homes and Buildings in Greater Essex](#) which can be downloaded [here](#).

ECC welcome revised criterion 2 with reference to the Greater Essex Planning Policy Position for Net Zero Carbon Development (Supporting Document 33). This policy is also included within the Chelmsford City Council Preferred Options Plan on public consultation until June 2024.

The *Essex Open Legal Advice – Energy policy and Building Regulations* prepared by Estelle Dehon KC, Cornerstone Barristers, 25 February 2024 addresses the 2023 Written Ministerial Statement on Local Energy Efficiency Standards Update and sets out the legal justification as to why the 2023 WMS does not undermine LPA powers. In addition, the advice identifies significant doubts about the lawfulness of the 2023 WMS and highlights that it is currently under challenge via judicial review.

The legal advice is very clear that LPAs have statutory authority to set energy efficiency targets that exceed the baseline in national Building Regulations and there is also no restriction on how the policy is expressed, including the metrics used in a policy and how these are calculated. Therefore, it is entirely reasonable and legally justified to progress the evidence-led energy metrics policy approach to achieving net zero carbon homes and buildings in Greater Essex. This approach also aligns with local and national climate targets and delivers wider benefits to communities.

ECC welcome criterion 4 subject to the suggested amendments below, which is consistent with the ECC policy position, and has been updated since the revised text was provided to the parish council after the Regulation 14 consultation. ECC has published its Digital Strategy for Essex (2022) which seeks to further expand digital infrastructure and technologies, in addition to that being delivered by the Superfast Essex Programme. The EDG contains supplementary planning guidance for Planning for 5G and can be viewed [here](#) and [Planning Guidance for digital connectivity focused on fixed line broadband connections](#).

ECC recommend criterion 5 is amended to read:

5. *Proposals for new development or expansion of existing properties should be capable of receiving gigabit speed and reliable mobile and broadband connectivity. Proposals will be*

supported where the appropriate cabling and ducting is provided to the premises and linked to infrastructure networks, enabling the fastest available connections. Where connectivity is not currently available suitable ducting that can accept gigabit cable broadband, and/or 5G connectivity should be provided to the public highway or other suitable location.

Chapter 7 - Transport and Movement

ECC as the highway and transportation authority provides the following response.

Policy DNP15: Connection to Sustainable Transport and Village Amenities

ECC recommend criteria 2 is amended to refer to 'and convenient' pedestrian and cycle connections to ensure that the routes are consistent with desire lines and encourage their use in terms of safety and directness. The new Highway Code states that pedestrians, cyclists, horse riders, carriage drivers and motorcyclists, as the most vulnerable road users, should take priority over cars.

The Road Network: the A414

The Air Quality Management Area (AQMA) between Gay Bowers Lane and Danbury village green at Danbury was revoked in 2024.

Aspirations for Connectivity – Table 2

Table 2 - Aspirations for Connectivity identifies several aspirations of the parish council with regards schemes to enhance movement and connectivity via sustainable modes. ECC, as the highway authority, supports the aspiration of these schemes to increase the use of sustainable modes and would be required to be involved in any projects relating to these aspirations.

Any relevant schemes may be considered through the pre-application discussions if directly relating to the site allocations in the Plan and/or the [Chelmsford Local Highways Panel \(CLHP\)](#) The CLHP covers potential schemes regarding traffic management improvements; tackling congestion; Public Rights of Way improvements; cycling schemes; passenger transport improvements; minor improvement schemes and aesthetic improvements to the Local Community. In order to progress potential schemes, the parish council will need to make a case for funding via the LHP. The LHP is able to consider locally requested measures that are not able to be prioritised for funding through other dedicated highways budgets but meet the desires of the local community. The Panels prioritise the local concerns and make recommendations to the Cabinet Member for the implementation of highway schemes that meet the concerns of local people. Potential schemes can be requested via the CLHP link above.

ECC considers aspirations 1 a) and c) would more than likely require third party land as it is unlikely there would be land available from the site allocations in the Plan or highway land. This would prove the deliverability of these schemes difficult. Clarity is required on this point.

Aspiration b) refers to a park and ride facility from Maldon through Danbury linking with the existing Sandon park and ride. ECC considers that to be successful any park and ride service needs a high level of priority/segregation to ensure short journey times compared to the private car and such segregation is not possible along this part of the A414. Where the A414 passes through the built-up area of Danbury some delays are incurred because of vehicles taking access into driveways and residential roads. Delays can also occur due to the hilly and windy nature of the road in the centre of Danbury and slow-moving vehicles e.g. refuse vehicles and parked vehicles.

With regards d), in considering mitigation at Well Lane for the adopted Chelmsford Local Plan, it was considered that the provision of a footpath link between Danbury school and the A414, although on the main desire line for pedestrians, could lead to abuse by local traffic seeking to avoid negotiating the junction traffic at peak hours. It is anticipated that this could noticeably

increase informal drop-off, waiting and parking from school traffic wishing to avoid the junction and result in worsening the traffic flow issues on the A414. There is also insufficient highway land available in the vicinity of Well Lane junction to move the existing bus stop into a lay-by. It could lead to misuse by motorists – particularly at peak school hours – with drivers seeking to park in the lay-by to avoid navigating the Well Lane junction a second time.

ECC would expect Site Allocations A to E and any other windfall development to implement the aspiration e) and provide connectivity to existing bridleways and cycleways along with the creation of new multi-user/functional and safe routes. This aspiration is largely reflected in Policy DNP13 against which the site allocations will also be considered.

Aspirations for the A414

With regards Aspirations for the A414, ECC consider b) and c) should be considered through the CLHP and the wording amended to reflect that they are aspirational and have not yet been assessed regarding their feasibility and funding etc: In addition, the A414 is a strategic route expected to carry significant vehicle flows, which is acknowledged in paragraph 7.1 with regards the residents desire for additional crossing points. Consequently, a 30mph speed limit along the entire route would not be supported. ECC welcome the amendments to 2 b) and c) as suggested in the ECC response to the Regulation 14 Plan consultation.

Policy DNP16: New Employment Development

ECC recommend criterion 7 is amended to be consistent with the wording proposed in Policy DNP3, criteria 5 as below:

7. Proposals for new developments or expansion of existing properties should be capable of receiving gigabit ~~high~~ speed and reliable mobile and broadband connectivity. Proposals will be supported where the appropriate cabling and ducting is provided to the premises and linked to infrastructure networks, enabling the fastest available connections. Where connectivity is not currently available suitable ducting that can accept ~~gigabit broadband, fixed line gigabit-cable broadband~~ and/or 5G connectivity should be provided to the public highway or other suitable location.

Table 3: Aspirations for Recreation and Leisure

Reference is made in Aspiration 1b to the potential to build a Mountain biking / BMX track in a Danbury quarry (Royal Oak) when gravel extraction is finished. The Plan does not have the jurisdiction to include provisions relating to development that is 'excluded development', namely minerals and waste matters as outlined in the Planning Advisory Service guidance [here](#) (pages 9 and 10). The current Royal Oak permission requires restoration to agriculture and nature conservation and therefore this aspiration would be contrary to the extant planning permission. Any facilitation of this aspiration would therefore have to be made through a revised planning application to ECC, as the MWPA, as part of any amended restoration scheme and determined against the Development Plan.

Chapter 10 - Heritage

Policy DNP15: Proposals for new or improved amenities

ECC recommend criterion 1 b is amended to be consistent with the wording proposed in Policy DNP3, criteria 5 as below:

b) Proposals for new developments or expansion of existing properties should be capable of receiving gigabit ~~high~~ speed and reliable mobile and broadband connectivity. Proposals will be supported where the appropriate cabling and ducting is provided to the premises and linked to infrastructure networks, enabling the fastest available connections. Where connectivity is not currently available suitable ducting that can accept ~~gigabit broadband,~~

~~fixed-line~~ gigabit cable broadband and/or 5G connectivity should be provided to the public highway or other suitable location.

Danbury Design Guide

1.3 Green Energy

ECC welcome reference to the requirement for electrical vehicle charging points for all new development in b and c . However, reference should be made to these being consistent with the ECC Electric Vehicle Charge Point Strategy and the Essex Planning Officers' Association's (EPOA) Parking Standards, which are being reviewed and can be viewed [here](#). They include details covering electric vehicle charging requirements and standards for both residential and non-residential uses, including on and off-street locations. Once these standards have been approved it is expected that they will be a material consideration to which new development will need to have regard to at an early stage of the design process.

ECC has prepared an [Electric Vehicle Charge Point Strategy](#) to deliver 'the Right Charger in the Right Place' so that by 2030, residents, businesses and visitors in Essex, where car travel is necessary, will be able to use electric vehicles and be assured there is an accessible, reliable, easy-to-use, safe and fairly priced charging network. The Strategy will be refreshed by 2025 (Phase 2 Strategy) to look at longer-term private car use and EV uptake. It will explore the supply of renewable energy to EV charge points and how the conversion of public transport, taxis and freight vehicles to cleaner fuels can be achieved. Separate strategies will be developed to provide for alternative clean and zero emission fuels, such as hydrogen. to deliver 'the Right Charger in the Right Place' so that by 2030, residents, businesses and visitors in Essex, where car travel is necessary, will be able to use electric vehicles and be assured there is an accessible, reliable, easy-to-use, safe and fairly priced charging network. The Strategy will be refreshed by 2025 (Phase 2 Strategy) to look at longer-term private car use and EV uptake. It will explore the supply of renewable energy to EV charge points and how the conversion of public transport, taxis and freight vehicles to cleaner fuels can be achieved. Separate strategies will be developed to provide for alternative clean and zero emission fuels, such as hydrogen.

ECC recommend b and c are amended to read:

- b) Electrical vehicle charging points for all new developments to have regard to the ECC standards set out in the EPOA Parking Standards.*
- c) For further information on electric vehicle charging, see the Essex Design Guide at www.essexdesignguide.co.uk/climate-change/electric-vehicles/ and the Electric Vehicle Charge Point Strategy.*

1.4 Accessible Homes

ECC notes a) makes reference to new developments catering for different needs at various stages in life and for those with disabilities. This will be guided by the Policy DM1 – Size and Type of Housing in the Chelmsford Local Plan, which is subject to consultation on a Preferred Options Plan.

ECC is supportive of the proposed changes to Policy DM1 – Size and Type of Housing, in particular Part Aii which increases the requirement for new dwellings to achieve requirement Part M, Category 2 (Accessible and adaptable dwellings) M4(2) of Schedule 1 (para 1) to the Building Regulations 2010 (as amended), from 50% to 100% within all development of 10 or more dwellings, as this will help to address the fact that the number of people with disabilities is likely to increase substantially with an ageing population. This will be relevant to neighbourhood plan sites A, B and D given their scale.

ECC has commissioned a 'Supported and Specialist Housing and Accommodation Needs Assessment' which is being undertaken by Housing Lin. The work commenced May 2024 and is expected to be completed by December 2024. The evidence base will include data on Chelmsford residents who need specialist accommodation to meet their needs due to their age, health, disability, mental health, cognitive ability or living with Learning Disability or Autism.

1.5 Storage

ECC support the reference to cycle storage in a) being required to follow ECC standards (Essex Parking Standards: Design and Good Practice (2009) or successor document. The EPOA Parking Standards are being reviewed and can be viewed [here](#). More detailed design guidance is provided for both residential and commercial cycle parking taking account of the Department for Transport Local Transport Note (LTN) 1/20 guidance. Once the new parking standards have been approved it is expected that they will be a material consideration to which new development will need to have regard to at an early stage of the design process.

ECC agree that cycle parking should be either within a garage or external so access into the house is not necessary. Parking should be within the property boundary rather than shared facilities and covered, secure and large enough to meet the relevant standards. A door width of at least 1.0m should be provided upon access to storage facilities when provided within the footprint of the dwelling or as a freestanding shed. In flatted developments the cycle store should be incorporated within the building but accessed directly from the outside with a minimum recommended door width of 1.2m.

ECC support reference to new developments being required to provide for rainwater harvesting on site as this will help to minimise overall water consumption and maximise its reuse. This should be a requirement for all new development.

2.3 Connectivity

ECC recommend a) is amended to require new pedestrian and cycle routes to also be convenient as this will encourage their usage.

Safe and convenient pedestrian and cycle friendly routes should be developed to reduce the need to travel by car and to provide connectivity to the local area

2.4 Parking

Reference is made to the Essex Parking Standards - Design and Good Practice (2009), or successor document in b) and c). These parking standards are currently being reviewed by the EPOA and can be viewed [here](#). They have been subject to two consultations with LPAs and developers. The standards are being revised to reflect changes in the new Use Class Orders and national planning policy. Different standards are required in different areas based on levels of accessibility, namely town centres (highly accessible); rural (poorly accessible); and other areas (moderately accessible). Details also cover electric vehicle charging requirements for both residential and non-residential uses. More detailed design guidance is also provided for both residential and commercial cycle parking taking account of LTN 1/20 guidance. Once these standards have been approved it is expected that they will be a material consideration to which new development will need to have regard to at an early stage of the design process.

2.6 Commercial Developments

Please refer to comments in 2.4 Parking regarding the review of the EPOA Parking Standards, which can be viewed [here](#).

References and Bibliography

ECC recommend reference is made to the current [National Planning Policy Framework \(December 2023\)](#) rather than the 2021 version which has been replaced.

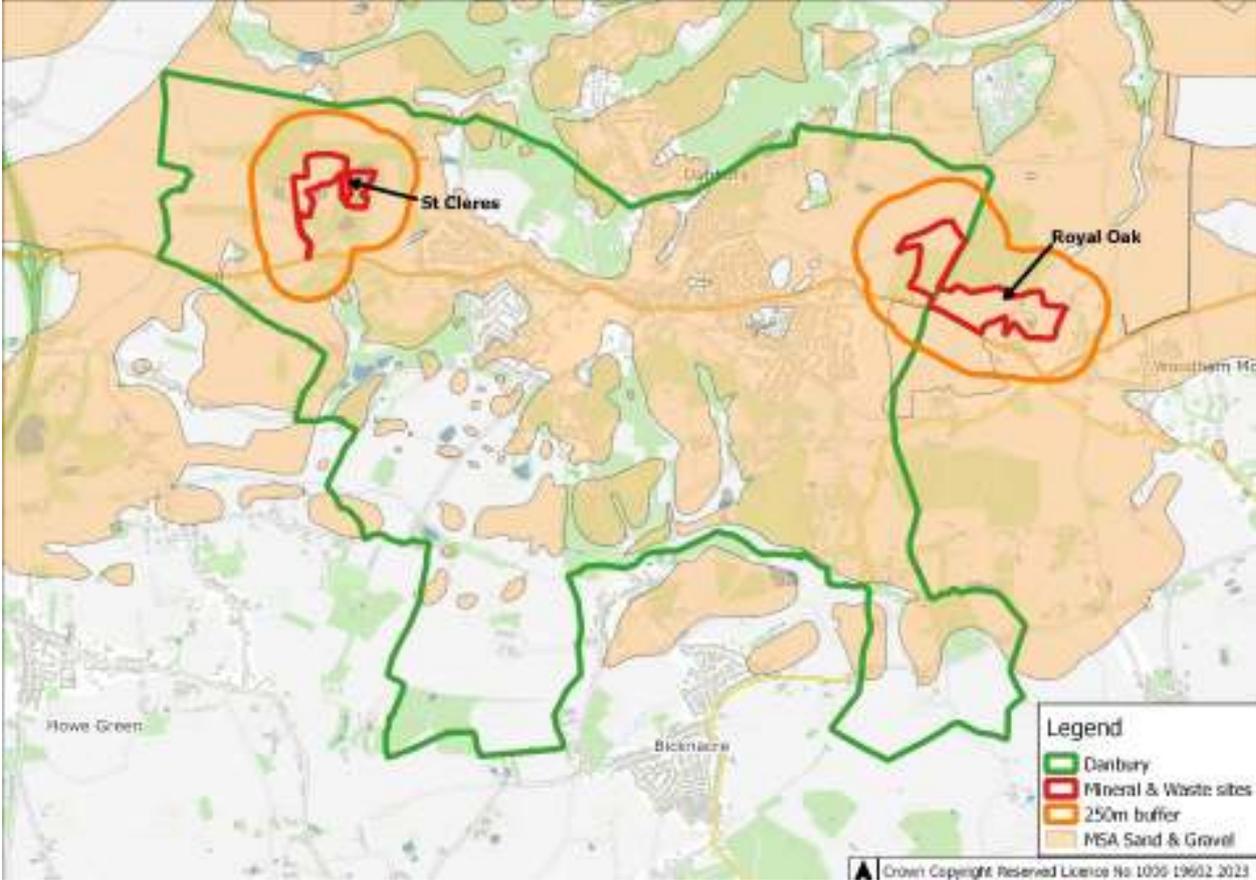
Conclusion

Please contact me if you require further information or would like to discuss this response in more detail.

Yours sincerely,

Kevin Fraser
Principal Planning Officer (Spatial Planning)

Appendix 1 – Mineral Safeguarding Area for Sand and Gravel and Mineral and Waste Sites in the Plan area



Comment

Consultee Mr Christopher Tressider (1358480)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mr Christopher Tressider (1358480)

Comment ID DNP-64

Response Date 13/06/24 17:14

Status Processed

Submission Type Web

Version 0.2

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site Plan B Land at Tyndale Farm

Question 2

Please add your comments below

This proposal would effectively be a large new housing estate in what is a small rural village. The proposed development would be on prime agricultural land historically used to grow crops as part of our national food security. 63 new houses would bring with them well over 100 or so vehicles adding locally to the already congested A414 through the village. Pollution levels will increase greatly. Cherry Garden Lane is currently a single-track road at the end which would then adjoin the estate. This would potentially be used as a rat run. To widen it would cause the loss both of parts of gardens and loss of its rustic character as it would to the surrounding roads and narrow lanes. The site also supports a diverse range of local wildlife. Some of which is endangered. There is also a footpath through the field regularly used by local people.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mr John Palmer (1359294)
Email Address
Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation
Comment by Mr John Palmer (1359294)
Comment ID DNP-65
Response Date 19/06/24 00:56
Status Processed
Submission Type Web
Version 0.4

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site B: Land at Tyndales Farm West

Question 2

Please add your comments below

I would like to object to the plan to build 65 houses on the Tyndale Farm field adjacent to Charry Garden Lane and the A414.

I am finding it difficult to understand why this application has come up again bearing in mind that over the last 10 years it has been discussed extensively and I presume rejected for many reasons. The original application to turn the field into sand and gravel pit was extensively objected to and many of the reasons for this will be equally applicable to this application. I fails to see what has changed and in fact the objections submitted then are even more applicable now!

I am not going to go into the many similar reason now but will mention a few.

1) Being a geologist by education I am vary aware of the local geology of the Danbury area which is predominantly sand and gravel deposits which a london clay substrate. The fact that on the opposit side of the A414 is a working sand and gravel quarry and that the owner of the field was wanting to sell the field also as a sand and gravel quarry indicaates that this field would be problematic to build on.

Any building would require substantial foundations which will inevitably impact the drainage annd water table in the surrounding area.

This is important as there are a number of existing houses (Hyde Green, Cherry Garden Lane, Barley Mead) that could well experience subsidence as a result of this development. This historically is a

significant problem in Danbury with substantial houses having to be demolished.

It would be interesting to see what legal claims could ensue if it was proven that the the development caused subsidence to existing housing in the area!

2. In the previous applications one of the most significant objections was due to vehicular access to the estate. Since then, large scale housing development in Maldon has meant traffic through Danbury has increased massively and will continue to do so. At rush hour times it is not unusual for the whole of Danbury to be gridlocked. Ironically this could extend to beyond the proposed entrance to the estate in the morning !

Predominant traffic flow is to and from Chelmsford. More houses on the East side of Danbury (just the worst place to position an estate) will exacerbate this.

Couple this to the fact that visibility is poor due to a bend and the total unsuitability of utilising Cherry Garden Lane a narrow single track that may become a "rat run" to avoid the aforementioned congestion. No other access is available and there is no other route that avoids going through the centre of Danbury.

3) Utilities and Amenities. Ten years ago it was stated that amenities such as schools, doctors, dentists, shops etc were already badly stretched. Since then the situation has worsened. The Medical Centre in particular cannot cope with the population of the existing village. Waiting lists can extend to over 3 weeks and people are giving up on it as a village health facility. I have lived in the village for over 50 years and health care was better 50 years ago than it is now. More housing in the village cannot be supported by the existing facilities.

4. Water, sewerage & electricity supplies. In the past 10 years major work has had to be done in order to provide for an increasing population and repair aging pipework. This resulted in the A414 being dug up causing lengthy and large scale congestion. For the development, new pipe swill have to be laid and new electricity and phone lines provided causing more disruption and stress.

5. Road conditions. The roads around Danbury are suffering badly from potholes and subsidence. The construction vehicles passing through the village will exacerbate this.

6. Environmental degradation. The field provides a clear delineation of the village and there is extensive wildlife that utilises the area which will be adversely impacted coupled with the fact that the public makes great use of the public pathway that crosses the land. Extensive scenic views through to Maldon will be badly impaired by the development.

Pollution. Building the estate in close proximity to existing residences will cause dust and noise pollution resulting in physical and mental health issues to the existiing population. This was highlighted 10 years ago quite extensively.

There are many more issues that I could mention. Ultimately the site is in the wrong location in the village being on the east rather than the west side and is only a candidate because the owner has wanted to sell it for many years and make the maximum profit possible rather than consider what is best for the existing village.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mr Steven Richard George
Email Address (1359319)
Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation
Comment by Mr Steven Richard George (1359319)
Comment ID DNP-66
Response Date 14/06/24 08:56
Status Processed
Submission Type Web
Version 0.1

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site A Sandpit Field

Question 2

Please add your comments below

Strongly object to the proposal on a very busy section of the A414. Not to mention the detrimental effect on the environment and local wildlife. The area opposite and around this field has been designated a wildlife zone and cutting of the grass and maintenance of the vegetation has been reduced for this reason. There are badger sets around this area also. The proposed access to this site does not and cannot exist as this land is privately owned.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Agent Jenny Fryer (1326722)

Email Address

Company / Organisation Pinnacle Planning

Address

Consultee Nick Banks (1329382)

Email Address

Company / Organisation Richborough

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Richborough (Nick Banks - 1329382)

Comment ID DNP-67

Response Date 17/06/24 18:49

Status Processed

Submission Type Web

Version 0.3

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Chapters 5 and 6

Question 2

Please add your comments below

Objective – Housing and Development

The supporting text to the Objective (page 27) states inter alia; “properties for younger people and smaller properties for downsizers will be a priority”. It isn’t clear what tenure or size of dwellings is being referred to in this context or how this priority will be implemented. It should therefore be removed. As noted in Policy DNP2 of the DNP, there is a national requirement to provide First Homes as part of the affordable housing mix. These properties are discounted properties for sale, aimed at first time buyers. There are also stipulations in Policy DNP2 regarding dwelling mix. This provides further

justification for the removal of reference to properties for younger people or those downsizing as clear guidance is provided elsewhere in the document.

Policy DNP1: Housing Site Allocations

Richborough supports the allocation of housing sites in order to meet the level of development identified in Strategic Growth Site Policy 13 of the CLP.

Richborough notes the commentary in the Site Selection and Allocation Report (March 2022) and considers the approach to be appropriate. The methodology for identifying sites within or adjoining the defined settlement boundary is commensurate with the Neighbourhood Plan basic condition of achieving sustainable development. The sites identified are all accessible to the existing facilities and amenities of Danbury and the future development will bring additional expenditure to the area.

The Table at Point 1 of Policy DNP1 highlights the identified sites and includes an approximate scale of development which is to be provided. Point 2 clarifies that the balance of the Local Plan housing requirement (7 units) may come forward as windfall development on smaller sites.

Richborough supports the approach not to stipulate the number of dwellings to be brought forward on each site as a maximum. Danbury Parish Council (DPC) will be a statutory consultee any proposed schemes of course, once planning applications have been submitted and matters of scale and layout are sought for approval.

Figure 5 comprises a Plan which is referred to within the text of Policy DNP1 and identifies the allocated sites in the table within the Policy. Each of the sites is also identified by a separate Plan at the end of the individual Site Allocation Policies. In the example of Site B, this comprises Figure 7. It is clear that Figure 5 and Figure 7 are not consistent, and amendments are required to ensure this is the case in order to provide clarity and meet the basic conditions. The delivery of the draft allocated Site B has been the subject of pre-application engagement with Danbury Parish Council, Chelmsford City Council and Essex County Council (ECC) Highways. The submitted red line is provided at Appendix A and incorporates sufficient land to accommodate the criteria set out in Policy Site B: Land at Tyndales Farm West, including the provision of buffer planting to the east. Richborough is of the view that Figures 5 and 7 should be amended to be consistent with the Plan at Appendix A.

Site B: Land at Tyndales Farm West

Site Specific Policy B: Land at Tyndales Farm West relates to the site promoted by Richborough. The allocation includes a series of 'additional criteria' which the future development of the site must satisfy. Richborough make the following comments on these:

"1. Main vehicular access to the site will be a new junction from the A414 together with an associated diversion of Cherry Garden Lane east into the proposed access road, subject to detailed design including provision of bus stops and associated crossing points on the A414"

Richborough has engaged with Danbury Parish Council, Chelmsford City Council and Essex County Council (ECC) Highways in respect of the highway works required to deliver the site. Whilst the works identified in the Policy reflect the access requirements previously discussed, Richborough does not consider it appropriate to list them within the written text of the Policy. It is important to provide flexibility to allow for changes to the access strategy in the event further consultation with statutory consultees, including ECC Highways during the application consultation process, identifies an alternative access solution.

Therefore, Richborough suggest the replacement of this criterion with the following wording:

"The access strategy will be designed and agreed with Essex Highways and may include, but is not restricted to, junction improvements from the A414, diversion of Cherry Garden Lane and accessibility improvements along A414."

"3. Trees and Planting..."

Richborough support the desire to provide landscape buffers to the site boundaries and to protect trees where possible. However, it is considered that there is scope to remove certain points within criterion 3 to avoid duplication.

Criterion 3 sub points b-e relate to soft landscaping and screening. Reference is made to landscaping on various sides of the allocation to provide screening and landscape mitigation. Richborough is of the view that this level of repetition is unnecessary and could cause confusion when Chelmsford Council Officers are determining planning future applications.

There is also no justification for, or clarification as to timescales associated with the early provision of landscape buffer planting and mitigation planting (criterion c and f). It is unclear how this is in conformity with the CLP and should be removed. There is no reasoned justification for the mitigation planting to be provided prior to the commencement of ground works and it isn't clear how this meets the basic conditions for Neighbourhood Plans. Issues in regard to landscaping and the timing of planting should be considered during the determination of the application alongside a Landscape Strategy and

Landscape Visual Impact Assessment.

"4. Pre-application advice should be sought from Natural England to consider potential impacts on the nearby SSSIs (Danbury Common and Woodham Walter Common). Development of this housing allocation will comply with DNP9: Recreational pressure on SSSI land around Danbury."

Richborough do not consider this criterion to be necessary as the site is isolated from the SSSI's by residential housing and roads. Reference to compliance with Policy DNP 9 is unnecessary as the Policy wording stipulates scenarios when it is to be applied.

Natural England are a statutory consultee for any planning application submitted to Chelmsford Council and it is appropriate for engagement with Natural England to take place during the determination of an application.

"5. Consultation is required with ECC Minerals and Waste Planning Authority early in the master-planning stage as the very northern portion of the site is within the 250 metres boundary of Royal Oak Quarry." Similar to Point 4, Richborough do not consider this criterion to be necessary as ECC Minerals and Waste Planning Authority are a statutory consultee for any planning application submitted to Chelmsford Council and it is appropriate for engagement to take place during the determination of an application.

"9. Land within the site but beyond the developed area will be designated as open space for such uses as tree planting, biodiversity net gain factors, outdoor activities or allotments."

It is our understanding that the criterion is seeking to formally designate the onsite open space, once the scheme has been developed. This is despite the fact that the Neighbourhood Plan will have been made prior to the determination of an application and therefore the DNP open space designations will have already been established.

This approach is at odds with national guidance in respect of plan making and it isn't clear why this approach has been proposed. It is also unclear how open space on site would be designated post making of the Neighbourhood Plan.

The Planning Practice Guidance (PPG) states in respect of allocations in a Neighbourhood Plan :

"The site being allocated should be shown on the policies map with a clear site boundary drawn on an Ordnance Survey base map. A policy in the plan will need to set out the proposed land uses on the site, an indication of the quantum of development appropriate for the site and any appropriate design principles that the community wishes to establish."

Richborough do not consider it appropriate and question the ability for open space to be designated after a Neighbourhood Plan has been made. Richborough suggests the following replacement wording to secure the proposed uses for the areas of open space, to be determined via a planning application: "Onsite open space is to be used for such uses as tree planting, biodiversity net gain factors, outdoor activities (including formal play space) or allotments."

Policy DNP8: Open Spaces

Policy DNP8 relates to open spaces and includes a number of criteria that should be met when new residential developments require the provision of green space.

Criterion 4 of the Policy states: "Development proposals resulting in the loss of open space, especially within or adjoining the Conservation Area which would cause harm to the character of and their significance to the village will not be supported."

It is unclear how criterion 4 would be implemented or assessed without further clarification on triggers for implementation. The loss of open space (assuming this is a green field, as opposed to formal open space) is, by fact and degree, changing the character of an area. The tests for determining if harm is to be caused to the character of the village are not defined – as drafted, this criterion could be used to object to the development of the allocated sites simply because it changes the character of the village. The reference to "especially within or adjoining the Conservation Area" also leads to confusion around the application of the Policy.

Richborough suggests an amendment to the wording of criterion 4 as follows:

"Development proposals resulting in the loss of open space within or adjoining the Conservation Area which would cause harm to the character and significance of the village will not be supported."

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

If you wish to submit any supporting information, please upload it here [Regulation 16 Danbury Neighbourhood Plan - Richborough.pdf](#)

**If you wish to submit any supporting information,
please upload it here**

[J0032179_CJ_MP_004_Richborough_Danbury_Site
Location Plan_A2@1250_Neighbourhood Plan.pdf](#)

Danbury Neighbourhood Plan 2023-2036: Submission Version

Regulation 16 Consultation

Representations by Richborough

June 2024

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Appendix 1: Extent of Site B

Contact

Mike O'Brien
mike@pinnacleplanning.co.uk

Client

Richborough

Our reference

PP0056

June 2024

1. Introduction

- 1.1 This representation is prepared by Pinnacle Planning on behalf of our client Richborough. It provides representations to Chelmsford City Council (CCC) and Danbury Parish Council (DPC) in respect of the 'Regulation 16' Submission Version Consultation for the Danbury Neighbourhood Plan 2023-2036 (DNP). The consultation closes on 19 June 2024.

Background

- 1.2 Richborough is promoting the land which comprises emerging allocation Site B: Land at Tyndales Farm West, which is identified as being suitable for the erection of around 65 dwellings. The site lies to the east of Danbury and is located south of Maldon Road and Cherry Garden Lane. Richborough have promoted the site for residential development through formal consultation responses to the now adopted Chelmsford Local Plan and have engaged with Danbury Parish Council during previous stages of preparation for the DNP.
- 1.3 Richborough is a specialist strategic land promoter with a track record of delivery spanning over twenty years. The business acts in partnership with landowners to promote their holdings through the plan-making process and is committed to delivering high quality developments with the right blend of housing and infrastructure to meet local needs.
- 1.4 Richborough oversee the planning promotion process and work closely with local communities, planning officers, professional consultants and key stakeholders to create mutually beneficial schemes.

Neighbourhood Plan Policy Context

National Policy and Guidance

- 1.5 The National Planning Policy Framework (2023) confirms at paragraph 29 in respect of Neighbourhood Plans:
- “Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies.”*
- 1.6 A footnote to this paragraph further states: *“Neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area.”*
- 1.7 When examining Neighbourhood Plans there is a requirement for the emerging Plans to be tested against certain ‘basic conditions’¹ and other legal requirements before they proceed to referendum and are then made. The basic conditions are summarised below:
- a) having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order.

¹ Paragraph 8(2), Schedule 4B, Town and Country Planning Act 1990

- b) having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order.
- c) having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order.
- d) the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.
- e) the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority.
- f) the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.
- g) prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).

1.8 The Planning Practice Guidance confirms that consideration of compliance with the basic conditions should be undertaken throughout the preparation process to ensure its success at independent examination².

Chelmsford Local Plan (27 May 2020)

- 1.9 Chelmsford Local Plan (CLP) provides the strategic policy framework for Chelmsford Borough up to 2036 and seeks to direct future development to locations that respect the existing development pattern and hierarchy of settlements. Danbury is identified as a Key Service Settlement in the settlement hierarchy at Strategic Policy S7 - The Spatial Strategy. Key Service Settlements comprise the second tier in the hierarchy, following City or Town (Chelmsford and South Woodham Ferrers).
- 1.10 Strategic Policy S7 confirms that new development allocations will be focussed on three Growth Areas and distributes growth to settlements within these areas. Danbury is within the South and East Chelmsford Growth Area and is allocated 100 dwellings to be accommodated by 2036.
- 1.11 Strategic Growth Site Policy 13 - Danbury confirms that sites comprising the allocation of around 100 new homes will be identified and consulted upon through the emerging DNP. Reference is made within the Policy and supporting text to the provision of a mix of dwelling sizes and types including affordable housing, along with consideration of ecological, heritage and transport matters.
- 1.12 A period of consultation on the Local Plan Review Preferred Options (LPRPO) closes on 19 June 2024. The LPRPO retains Danbury within the settlement hierarchy as a Key Service Settlement and carries forward the allocation of 100 dwellings to Danbury to the end of the Plan Period to 2041.
- 1.13 The national policy and the adopted CLP Policies of relevance are a key consideration in the consultation and examination process for the emerging DNP.

² PPG, Paragraph: 066 Reference ID: 41-066-20140306

Structure of Representations

1.14 Richborough's representations to the Pre-Submission Draft consultation are comprised of this written Report which is structured as a chronological response to Chapters of the DNP and the Design Code as below:

- Chapter 2 provides commentary on Chapter 5 of the DNP in respect of Housing and new development, including site allocations
- Chapter 3 provides commentary on Chapter 6 of the DNP in respect of the environment
- Chapter 4 provides short concluding remarks.

2. Response to Chapter 5 - Housing and Development

Objective - Housing and Development

- 2.1 The supporting text to the Objective (page 27) states inter alia; *“properties for younger people and smaller properties for downsizers will be a priority”*. It isn't clear what tenure or size of dwellings is being referred to in this context or how this priority will be implemented. It should therefore be removed.
- 2.2 As noted in Policy DNP2 of the DNP, there is a national requirement to provide First Homes as part of the affordable housing mix. These properties are discounted properties for sale, aimed at first time buyers. There are also stipulations in Policy DNP2 regarding dwelling mix. This provides further justification for the removal of reference to properties for younger people or those downsizing as clear guidance is provided elsewhere in the document.

Policy DNP1: Housing Site Allocations

- 2.3 Richborough supports the allocation of housing sites in order to meet the level of development identified in Strategic Growth Site Policy 13 of the CLP.
- 2.4 Richborough notes the commentary in the Site Selection and Allocation Report (March 2022) and considers the approach to be appropriate. The methodology for identifying sites within or adjoining the defined settlement boundary is commensurate with the Neighbourhood Plan basic condition of achieving sustainable development. The sites identified are all accessible to the existing facilities and amenities of Danbury and the future development will bring additional expenditure to the area.
- 2.5 The Table at Point 1 of Policy DNP1 highlights the identified sites and includes an approximate scale of development which is to be provided. Point 2 clarifies that the balance of the Local Plan housing requirement (7 units) may come forward as windfall development on smaller sites.
- 2.6 Richborough supports the approach not to stipulate the number of dwellings to be brought forward on each site as a maximum. Danbury Parish Council (DPC) will be a statutory consultee any proposed schemes of course, once planning applications have been submitted and matters of scale and layout are sought for approval.
- 2.7 Figure 5 comprises a Plan which is referred to within the text of Policy DNP1 and identifies the allocated sites in the table within the Policy. Each of the sites is also identified by a separate Plan at the end of the individual Site Allocation Policies. In the example of Site B, this comprises Figure 7. It is clear that Figure 5 and Figure 7 are not consistent, and amendments are required to ensure this is the case in order to provide clarity and meet the basic conditions. The delivery of the draft allocated Site B has been the subject of pre-application engagement with Danbury Parish Council, Chelmsford City Council and Essex County Council (ECC) Highways. The submitted red line is provided at Appendix A and incorporates sufficient land to accommodate the criteria set out in Policy Site B: Land at Tyndales Farm West, including the provision of buffer planting to the east. Richborough is of the view that Figures 5 and 7 should be amended to be consistent with the Plan at Appendix A.

Site B: Land at Tyndales Farm West

- 2.8 Site Specific Policy B: Land at Tyndales Farm West relates to the site promoted by Richborough. The allocation includes a series of 'additional criteria' which the future development of the site must satisfy. Richborough make the following comments on these:

1. Main vehicular access to the site will be a new junction from the A414 together with an associated diversion of Cherry Garden Lane east into the proposed access road, subject to detailed design including provision of bus stops and associated crossing points on the A414.

- 2.9 Richborough has engaged with Danbury Parish Council, Chelmsford City Council and Essex County Council (ECC) Highways in respect of the highway works required to deliver the site. Whilst the works identified in the Policy reflect the access requirements previously discussed, Richborough does not consider it appropriate to list them within the written text of the Policy. It is important to provide flexibility to allow for changes to the access strategy in the event further consultation with statutory consultees, including ECC Highways during the application consultation process, identifies an alternative access solution.

- 2.10 Therefore, Richborough suggest the replacement of this criterion with the following wording:

"The access strategy will be designed and agreed with Essex Highways and may include, but is not restricted to, junction improvements from the A414, diversion of Cherry Garden Lane and accessibility improvements along A414."

3. Trees and Planting:

a. Protect existing trees and hedges across the site including at the site entrance; where they need to be removed it must be demonstrated through a landscape strategy that they will be replaced with planting of the same or better value. Where new planting is required, this should be of native varieties and should be informed by The Essex Design Guide and the Danbury Design Guide.

b. A strong landscape buffer is required to provide a new settlement edge on both the open eastern boundary immediately west of the PRow and the southern boundary of the site, with provision of multifunctional green infrastructure linking hedgerows and trees.

c. A strong landscape buffer is also required, initiated prior to development, on the northern boundary alongside the A414 and diverted Cherry Garden Lane along with the retention and strengthening of existing roadside hedgerows and hedgerow trees.

d. On the northwestern edge of the site, the rapid establishment of a landscape buffer, initiated prior to development, is required, to provide filtered views and soften the development edge.

e. To reduce the impact on residents' views from the western edge of the site the existing landscape buffer should be reinforced by maximising the introduction of characteristic landscape, visual and habitat enhancements.

f. Mitigation planting with appropriate root protection must be achieved before ground works commence.

g. Dwelling boundaries within the site should include natural hedging where appropriate to allow free flow for existing wildlife corridors. Incorporate street tree planting where appropriate, prioritising the use of native species.

- 2.11 Richborough support the desire to provide landscape buffers to the site boundaries and to protect trees where possible. However, it is considered that there is scope to remove certain points within criterion 3 to avoid duplication.
- 2.12 Criterion 3 sub points b-e relate to soft landscaping and screening. Reference is made to landscaping on various sides of the allocation to provide screening and landscape mitigation. Richborough is of the view that this level of repetition is unnecessary and could cause confusion when Chelmsford Council Officers are determining planning future applications.
- 2.13 There is also no justification for, or clarification as to timescales associated with the early provision of landscape buffer planting and mitigation planting (criterion c and f). It is unclear how this is in conformity with the CLP and should be removed. There is no reasoned justification for the mitigation planting to be provided prior to the commencement of ground works and it isn't clear how this meets the basic conditions for Neighbourhood Plans. Issues in regard to landscaping and the timing of planting should be considered during the determination of the application alongside a Landscape Strategy and Landscape Visual Impact Assessment.

4. Pre-application advice should be sought from Natural England to consider potential impacts on the nearby SSSIs (Danbury Common and Woodham Walter Common). Development of this housing allocation will comply with DNP9: Recreational pressure on SSSI land around Danbury.

- 2.14 Richborough do not consider this criterion to be necessary as the site is isolated from the SSSI's by residential housing and roads. Reference to compliance with Policy DNP 9 is unnecessary as the Policy wording stipulates scenarios when it is to be applied.
- 2.15 Natural England are a statutory consultee for any planning application submitted to Chelmsford Council and it is appropriate for engagement with Natural England to take place during the determination of an application.

5. Consultation is required with ECC Minerals and Waste Planning Authority early in the master-planning stage as the very northern portion of the site is within the 250 metres boundary of Royal Oak Quarry.

- 2.16 Similar to Point 4, Richborough do not consider this criterion to be necessary as ECC Minerals and Waste Planning Authority are a statutory consultee for any planning application submitted to Chelmsford Council and it is appropriate for engagement to take place during the determination of an application.

9. Land within the site but beyond the developed area will be designated as open space for such uses as tree planting, biodiversity net gain factors, outdoor activities or allotments.

- 2.17 It is our understanding that the criterion is seeking to formally designate the onsite open space, once the scheme has been developed. This is despite the fact that the

Neighbourhood Plan will have been made prior to the determination of an application and therefore the DNP open space designations will have already been established.

2.18 This approach is at odds with national guidance in respect of plan making and it isn't clear why this approach has been proposed. It is also unclear how open space on site would be designated post making of the Neighbourhood Plan.

2.19 The Planning Practice Guidance (PPG) states in respect of allocations in a Neighbourhood Plan³:

"The site being allocated should be shown on the policies map with a clear site boundary drawn on an Ordnance Survey base map. A policy in the plan will need to set out the proposed land uses on the site, an indication of the quantum of development appropriate for the site and any appropriate design principles that the community wishes to establish."

2.20 Richborough do not consider it appropriate and question the ability for open space to be designated after a Neighbourhood Plan has been made. Richborough suggests the following replacement wording to secure the proposed uses for the areas of open space, to be determined via a planning application:

~~*Land within the site but beyond the developed area will be designated as **Onsite** open space*~~ ***is to be used*** for such uses as tree planting, biodiversity net gain factors, outdoor activities (***including formal play space***) or allotments."

³ PPG paragraph 098 reference ID: 41-098-20190509

3. Response to Chapter 6 - Environment

Policy DNP8: Open Spaces

- 3.1 Policy DNP8 relates to open spaces and includes a number of criteria that should be met when new residential developments require the provision of green space.
- 3.2 Criterion 4 of the Policy states: *“Development proposals resulting in the loss of open space, especially within or adjoining the Conservation Area which would cause harm to the character of and their significance to the village will not be supported.”*
- 3.3 It is unclear how criterion 4 would be implemented or assessed without further clarification on triggers for implementation. The loss of open space (assuming this is a green field, as opposed to formal open space) is, by fact and degree, changing the character of an area. The tests for determining if harm is to be caused to the character of the village are not defined - as drafted, this criterion could be used to object to the development of the allocated sites simply because it changes the character of the village. The reference to “especially within or adjoining the Conservation Area” also leads to confusion around the application of the Policy.
- 3.4 Richborough suggests an amendment to the wording of criterion 4 as follows:

“Development proposals resulting in the loss of open space, ~~especially~~ within or adjoining the Conservation Area which would cause harm to the character ~~of~~ and ~~their~~ significance ~~to~~ of the village will not be supported.”

4. Conclusion

- 4.1 Richborough supports Danbury Parish Council in the preparation of a Neighbourhood Plan. The Regulation 16 Submission Version of the DNP is considered to be extensive and identifies available land for residential development in accordance with Strategic Growth Site Policy 13 - Danbury of the CLP.
- 4.2 Richborough supports the allocation of Site Specific Policy B: Land at Tyndales Farm West for around 65 dwellings.
- 4.3 Within this Representation, Richborough has sought to identify areas where the drafting of the Policies may lead to confusion; are not in accordance with the CLP; national policy and guidance; or where they otherwise depart from the basic conditions required for a Neighbourhood Plan. Outside of these areas, Richborough strongly support the DNP and the proposed Policies.

Appendix 1: Extent of Site B

PROJECT TITLE

**RICHBOROUGH
LAND AT TYNDALES FARM, DANBURY**

ISSUED BY London
DATE June 2024
SCALE@A2 1:1250
STATUS Draft

T: 020 7016 0720
DRAWN MH
CHECKED JC
APPROVED JC

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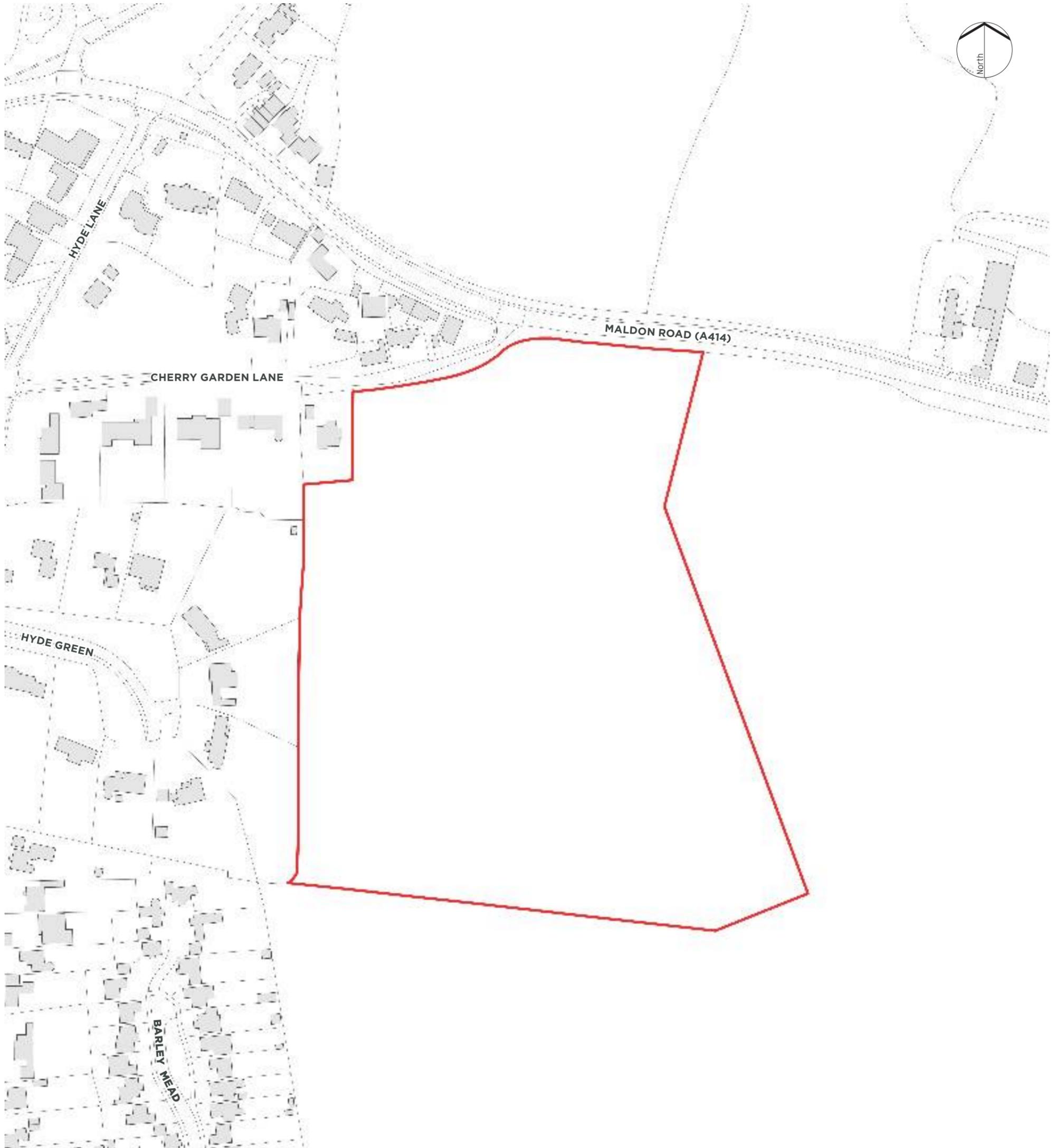
DRAWING TITLE

SITE LOCATION PLAN

DWG. NO. CJ_MP_004_Neighbourhood Plan

No dimensions are to be scaled from this drawing.
All dimensions are to be checked on site.
Area measurements for indicative purposes only.

© Carter Jonas. Quality Assured to BS EN ISO 9001: 2008
Source: Ordnance Survey



 Site boundary

0  100m

Comment

Consultee Mr Stefan Todman (1359375)
Email Address
Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation
Comment by Mr Stefan Todman (1359375)
Comment ID DNP-68
Response Date 15/06/24 12:02
Status Processed
Submission Type Web
Version 0.4

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Development of housing and business space in Danbury

Question 2

Please add your comments below

I do not want housing or business space to be developed on farmland in Danbury.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mrs Alison Todman (1359376)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mrs Alison Todman (1359376)

Comment ID DNP-69

Response Date 15/06/24 12:22

Status Processed

Submission Type Web

Version 0.1

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Development of housing and business space in Danbury

Question 2

Please add your comments below

I want to plead with you not to put housing or business space on farmland in Danbury. The green spaces are so extremely precious to both humans and all of nature. Once we've ruined it, it's gone forever. We must consider the wildlife living here. The deer, badgers etc & their habitats must be protected. The green space is essential for people's peace of mind and health. For us, it means being able to walk our dogs in the field and we meet locals doing the same every day - lots of people and their dogs enjoy the field. It's so beautiful to watch the crops grow and the seasons make their changes there.

Also, the amount of traffic on our roads will be unbearable. I already have opted to start work in Chelmsford at 5 or 6am to avoid traffic, but coming home even just yesterday the traffic was unbelievable- so jammed up around the city and the A12 looked at a standstill. Every day the traffic is too much. What would it be like with more & more houses?!

Please, PLEASE save our precious environment!

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Miss Louise Jeffries (1357266)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Miss Louise Jeffries (1357266)

Comment ID DNP-70

Response Date 15/06/24 13:28

Status Processed

Submission Type Web

Version 0.2

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below General

Question 2

Please add your comments below

Lack of infrastructure. Not enough doctors to see registered patients at Danbury Medical Surgery as too many patients on books. Not enough school places for local children. Main road in Danbury already heavily congested. Narrow lane down Hyde Lane and Cherry Garden lane cannot support large vehicles which are already dangerous as they are full of pot holes. Detrimental impact on the wildlife in the field if it was to be built on.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mr Christopher Jones (1359379)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mr Christopher Jones (1359379)

Comment ID DNP-71

Response Date 15/06/24 14:16

Status Processed

Submission Type Web

Version 0.2

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below General

Question 2

Please add your comments below

I would like to object on the following grounds;

1. Lack of infrastructure. The village of Danbury is already saturated with critical services such as doctors, dentist and education already at breaking point. Further strain of these services will impact quality of life of existing residents.
2. Highways are already congested. Proposed development will bring excessive amounts of vehicles onto single carriageway roads increasing risk of accidents both to other road users and pedestrians.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mr Malcolm Reid (1359380)
Email Address
Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation
Comment by Mr Malcolm Reid (1359380)
Comment ID DNP-72
Response Date 15/06/24 15:52
Status Processed
Submission Type Web
Version 0.1

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Danbury Neighbourhood Plan, Site D: Danecroft, Woodhill Road

Question 2

Please add your comments below

I believe that the plan for 14 dwellings on this site is excessive and will be detrimental to an area of the village which is defined by historic housing stock and open grassland. The published plan, point 8, refers to the site as a 'formerly biodiverse area', thereby recognising that it will no longer be biodiverse following the development of 14 new homes. Provision of native hedging will do little to negate this. A further consideration is that the proposed access is unsuitable for frequent vehicular movement as there is a blind bend to its left and the ever increasing amount of traffic on this road is only restricted to 40mph.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mr Ali Mashadi (1359387)
Email Address
Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation
Comment by Mr Ali Mashadi (1359387)
Comment ID DNP-74
Response Date 15/06/24 18:25
Status Processed
Submission Type Web
Version 0.2

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site D: Danecroft, Woodhill Road

Question 2

Please add your comments below

I would like to register our opposition to the proposed development above which by its nature will be large and intrusive. The proposed location will simply not be able to be supported through the existing infrastructure of roads and local services in its entirety. It will also have an adverse effect on the protected nature of Danbury and Danbury Common. It will certainly influence biodiversity and the ecology of the area. The development is only a stone throw away from our house and we cannot see how additional parking and transport facilities can be provided for 14 additional homes in such a small space. The proposed development whilst will sit neatly within an urban area will be totally out of character in this area. We will certainly hope that Chelmsford council will refuse permission for this development on the grounds stated above.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee MRS Pennie Lipscomb
(1356597)
Email Address
Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation
Comment by MRS Pennie Lipscomb (1356597)
Comment ID DNP-75
Response Date 16/06/24 09:33
Status Processed
Submission Type Web
Version 0.2

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site B: Land at Tyndales Farm West

Question 2

Please add your comments below

I strongly object to the selection of this site; the contradictions are clearly stated in the plan. It will put increasing pressure on the local amenities in Danbury particularly the A414 and other roads, the schools, health service and sewerage.

The destructive impact on Cherry Garden Lane, one of the leafy lanes named for preservation.

Both the construction phase and the long term will strongly impact on our quality of life.

We must build new homes in the right places- protecting our precious countryside and arable land.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mrs Debbie Wakefield
Email Address (1359391)
Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation
Comment by Mrs Debbie Wakefield (1359391)
Comment ID DNP-76
Response Date 16/06/24 11:18
Status Processed
Submission Type Web
Version 0.2

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site B: Land at Tyndales Farm West

Question 2

Please add your comments below

The building of new homes on this site will have a detrimental effect on the existing houses around this area and the community living there. The roads around this site are not suitable for the amount of additional houses they will need to service, any increase in traffic on these small narrow roads will be dangerous to those existing residents and users. In addition to this the field the is currently used by local residents as this is one of the safest places to walk either with dogs or families so it would be awful if this was to be taken away. One of the main reasons residents have chosen to live in Danbury is because of the access to open space and fields such as this so to take this away is wrong. If additional housing is really required there must be other sites that are more suitable with better and safer access.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mr Arthur Allen (307946)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mr Arthur Allen (307946)

Comment ID DNP-77

Response Date 16/06/24 12:29

Status Processed

Submission Type Web

Version 0.2

Question 2

Please add your comments below

All of the document. Comment is included in the attached document - Danbury Neighbourhood Plan 2024.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

If you wish to submit any supporting information, please upload it here [Danbury Neighbourhood Plan 2024.docx](#)

COMMENT ON DANBURY NEIGHBOURHOOD PLAN – 2024.

1.2 The purpose of neighbourhood planning is to give local people and businesses a much greater say in how the places where they live and work should change and develop over time.

Neighbourhood planning is designed to give local people a very real voice in shaping the look and feel of an area. Nothing of the kind. Chelmsford use as and when it suits them.

1.3 Danbury is about to enter a period of growth, with the Chelmsford Local Plan requiring land to be allocated in Danbury to accommodate around 100 new homes. The Neighbourhood Plan provides us, the local community, with the opportunity to influence the location and form of new growth, such that it best responds to the qualities of Danbury and our local needs.

With Hammonds Farm a foregone conclusion there is no need for additional new dwellings in Danbury.

1.4 But the Neighbourhood Plan is much more than this. It represents the community's manifesto for the Parish, bringing together more than just traditional planning matters. Indeed, applicants for growth and development in Danbury are required to fund new infrastructure through payment of a Community Infrastructure Levy (CIL) [See Chapter 11 and Glossary]. As and when the Neighbourhood Plan is formally 'made' as a planning policy document, **25% of all monies payable under CIL will be passed to the Parish Council to spend on locally identified projects. The Neighbourhood Plan is thus a very powerful document for identifying those projects that can help deliver positive change and improvement at the local level**

1.5 Danbury was formally designated as an area for neighbourhood planning purposes in 2016 (under the Localism Act 2011). **The Danbury Neighbourhood Plan Steering Group has surveyed, spoken with and listened to members of the community. Issues and opportunities raised during that process have informed production of the policies and projects now presented in this Submission Neighbourhood Plan.** No-one has ever spoken with us or communicated with us in any way.

1.8 Policies and Aspirations.

Aspirations The Neighbourhood Plan covers more than just traditional planning matters as it presents the community's vision for the area. Improvements that the community are seeking, but that cannot be delivered through planning policy, are identified, and contained in blue shaded boxes. These are included within the body of the report, rather than being presented in a separate chapter or supporting document, because they relate to the objectives and form a clear and important part of the story.

Whose aspirations and what community vision? This household has never been asked what our aspirations are or what our vision is. This is a minority view being foisted upon the majority of residents by an undemocratic Parish Council which is entirely unelected by the people of Danbury. In over 32 years of living in Danbury we have seen only one election for Parish Councillors. This is their view and not that of a properly constituted village consultation taking in the whole of the Danbury population.

1.12 Particularly relevant to the Neighbourhood Plan are the following policies in the Local Plan: ● Spatial Strategy: Development Locations and Allocations – Danbury is identified as a Key Service Settlement in the Local Plan and located within ‘Growth Area 3’ (South and East Chelmsford). It is identified as one of three key locations for sustainable development within the area. **The policy notes that the allocation in Danbury will help to support the village’s services and facilities.** This is gobbledegook. You don’t support the village services and facilities by introducing more population, you overburden them. Realistically it is the other way around. Services and facilities survive on their own merit. Services and facilities follow where there is a demand and this philosophy is designed to promote the continual growth of Danbury into an integral part of Chelmsford.

1.15 Furthermore, Danbury is within the ‘zone of influence’ of the Blackwater Estuary Special Protection Area and RAMSAR Site. This is an area sensitive to increased visitor pressure from any new housing development, particularly from disturbance to birds and their habitats. An Essex-wide strategy (called the Recreational disturbance Avoidance and Mitigation Strategy, or RAMS) has been prepared, identifying the potential for disturbance and the types of mitigation that might be needed. This is supported by a Supplementary Planning Document adopted by Chelmsford City Council in May 2020. All new development in Danbury which results in a net increase in new homes, however small, will need to provide financial contributions towards the mitigation measures. Developers can also agree bespoke mitigation measures with Chelmsford City Council and Natural England.

What mitigation measures? Has anyone told Maldon? More people concentrated into any area equate with more people pressure and the environment is always the loser. No financial contribution can ever alleviate the numbers of extra people. RAMS is just words to promote the illusion that something is being done by way of control.

1.16 **This Neighbourhood Plan is set in the context of the ‘Climate and Ecology Emergency’ declared by Chelmsford City Council in July 2019.** What “Climate and Ecology Emergency”. There is certainly no climate emergency and any ecology emergency is being created by Chelmsford itself in its drive for greater expansion of its boundaries and influence. The climate of the earth has been fluctuating eternally since the dawn of time and it is caused by so many variables that no-one can realistically do anything about. Co2 is not a factor. That is yet another of the central government lies which are being peddled on everything from global warming to the conflict in Ukraine. The truth as we all know is being heavily censored and not reported in the main stream media because it would be off message of the minority which wants to impose its will globally. The internationally respected Nils Bohr Geological Institute at Copenhagen university has conclusively proved, using ice core samples from the Greenland ice cap, that the earth is today on average a full 2.5 degrees Celsius colder than it was 8,500 years ago. The mythology (lies) about Co2 and global warming is based on figures since accurate records were first started to be kept at around the time of Charles Dickens when the Thames froze over and ice-fairs were held on the frozen river. This time, which also gave us the mythology of the white Christmas, coincided with what was the coldest point in the previous 10,000 years. It is only natural and expected that there should be some element of warming during the couple of centuries which have passed since then, but that does not in any way prove that we are on an unstoppable warming trend. It only shows that the planet is marginally warmer than it was in the time of the Thames freezing over which was the coldest point in the last 10,000 years. The earth is still on average 2.5 C colder than it was 8,500 years ago. There is no climate emergency and Chelmsford council are in complete La-La land in trying to claim that there is.

Every schoolboy knows (or should know) that Greenland was once ice free, hence its name which stems from when the Vikings found it and called it Vineland. In geological terms the ice cap is very recent. Where is the ice sheet which left behind its terminal moraine which then became Danbury hill as the ice retreated northwards? If that were happening today the politicians and wokes would all be panicking about what they could do to halt the end of the ice-age. It is all natural and unavoidable. There is no climate emergency. We live in a natural world and we are seeing nature, solar intervention and global geophysics at work. Get used to the idea that there is nothing anyone can do about it and start thinking seriously about the future of our village instead of the implementation of impractical and unsustainable woke agendas.

1.17 The City Council has pledged to reduce its own carbon emissions to Net Zero by 2030 and to encourage others to do the same. It is accompanied with a raft of actions has been proposed by the City Council to support this, including the promotion of sustainable forms Danbury Neighbourhood Plan 11 of development, promoting active travel, protecting and planting new woodland, and reviewing planning policies that encourage developers to build to zero-carbon standards.

You don't get anything for nothing. If reducing Co2 means a greater reliance on electricity then where is that electricity going to come from, renewable energy? Wind turbines have a 9.06% failure rate per turbine per year and require over an acre of ground per turbine. An urban area the size of Chelmsford will require a colossal investment in a huge area of land for wind energy to make up the shortfall. Wind turbines also need a colossal amount of lubrication which is sourced from mineral crude oil which has to be changed every year and then disposed of. Photo-voltaic is just as problematic because of the huge investment in land and the consequent diminution in the ability of Britain to source its own food supplies. We are already a nett importer of food and that situation is going to get worse. All very green of course, not. Electric vehicles are among the dirtiest on the planet when one considers their whole life cycle and running requirements. They pollute huge areas of countries such as the Democratic Republic of Congo with the effluents from the mining of raw materials and toxic lithium settlement pools which kill wildlife in minutes; all very green of course without considering the human cost of the slave labour used in obtaining those raw materials. Then there is the environmental cost of disposing of the spent batteries. Add in the fact that most of this so-called renewable energy technology is manufactured in China using energy from their own coal fired power stations and Chelmsford's drive to be Co2 zero can actually be seen to be in reality producing more Co2.

1.18 This Neighbourhood Plan seeks to promote high quality, eco-friendly design that respects the environmental qualities and landscape setting of Danbury, as well as wider matters such as improved conditions for walking and cycling, protecting and enhancing the network of multifunctional green infrastructure that characterises Danbury.

What does this actually mean? Cyclists are already a law unto themselves. They ride where they like, pay no heeds at all to prohibition notices and they believe, not unreasonably, that they are above traffic law which applies to the rest of us. Danbury and its unique character and landscape would be better protected if measures were taken to make cyclists open to penalty and walkers were given protection from them riding illegally with what appears total disregard for the rights of anyone else. Challenge them and you are met with a torrent of foul-mouthed abuse.

1.19 Any Plan for the future must also consider the implications raised by the Covid-19 pandemic. With social isolation and homeworking measures put in place during the pandemic the need to travel daily was reduced for many. This resulted in improvements to air quality as well as quieter and safer streets for walking and cycling. At the same time, it increased awareness of the importance of local shops and essential services, and the ability of people to be able to access those, with matters such as resilience about food supplies, for example, recognised. The measures also highlighted the importance of good quality broadband provision, the need for parks and spaces for people to exercise in, and the importance of well-designed homes and living spaces. Moreover, the importance of good social networks and community cohesion was highlighted, providing support to neighbours and those in need.

This really is complete drivel and sycophantic nonsense. What the totally unnecessary covid denial of human and civil rights did was to isolate and terrify vulnerable people who are still suffering the effects of that weaponisation of fear by the British government. Human beings are social animals which need social interaction with other human beings for their mental and physical welfare. The denial of this basic human right is now, at last, being recognised as the disaster for general health and wellbeing which it in fact was. To use the artificial concept of this enforced isolated existence as a justification for travelling less and staying within one's own community is 100% unacceptable and will not happen. Where are the statistics to sustain the arguments for improvement in air quality? Why are they not quoted? Cyclists still cycle illegally on the footways so how is that safer for pedestrians? Local shops are only beneficial if they are economically viable as a source of domestic shopping. The shops in Danbury are not economically viable for the greater number of the population who are facing financial pressures consequent on the artificially and deliberately escalated hike in all energy and fuel pricing. It is still more economically sensible for those people to visit a major supermarket for their shopping. You don't get "*the importance of good social networks and community cohesion was highlighted, providing support to neighbours and those in need*" by confining the people within their own homes or within their own village with little opportunity to go further. People in the main are perfectly able to manage their own social interactions and decide on their own community involvement without any involvement from any level of governance claiming to know what is best for them.

1.21 "All development in Danbury, where feasible, will be expected to make use of the best available sustainable design and technology. Proposals for development are expected to minimise the use of resources, mitigate against and be resilient to the impact of climate change".

Any development should always use the best available, design, materials and technology with the aim of making the development as environmentally friendly as possible whilst at the same time minimising the costs of occupancy. It has nothing to do with climate change about which you can do nothing.

1.24 "Through work on the Plan the Steering Group has endeavoured to engage, enthuse and energise Danbury residents and the wider community, including businesses and other stakeholders and organisations, to have their say on the parish's future and help shape the Neighbourhood Plan".

If this statement is true then why has no-one ever spoken to us about it? One must conclude that we are not the only Danbury residents who have not been consulted in any way shape or form.

1.26 There are various elements involved in preparing a Neighbourhood Plan. Broadly, they include:

a) Initial consultation to identify issues, concerns and areas of focus for the Neighbourhood Plan.

b) Collection of 'evidence' on the issues and potential options, ideas and strategies to be progressed through the Plan.

c) Production of and consultation on emerging policy ideas.

d) Drafting of and formal consultation on the Neighbourhood Plan (known as the Regulation 14 Stage).

e) Updating the Plan in response to consultation, submitting it to CCC for Regulation 16 consultation, followed by testing it through an independent examination process.

f) Subjecting the Neighbourhood Plan to a local referendum.

g) Adopting ('making') the Neighbourhood Plan as a policy document – if more than 50% of people that turn out vote 'yes' at the referendum".

The plan must only be accepted if more than 50% of the entire village electorate are balloted in a referendum. Individual mailings have been shown to be the most effective in the past. 50% of only a couple of hundred or less turnout is no endorsement of these proposals whatsoever.

1.28 Following the 'making' (adoption) of the Neighbourhood Plan the Parish Council will monitor the effectiveness of the policies and use of CIL funds to help deliver aspirations identified in the Plan. In time, updates to the Plan may be consulted upon to ensure that it remains up to date and relevant. This includes a commitment to reviewing the Plan and updating it as necessary as and when a new Chelmsford Local Plan is adopted. A review may also be triggered by other matters, such as updates to national policy or actions emerging from the City Council climate change action plan.

Given that the Chelmsford council climate change action plan cannot and will not affect the climate in any way whatsoever, why is it even included?

2.29 Danbury is also within a 10km zone of influence of the Crouch and Roach Estuaries Special Protection Area, RAMSAR site (Figure 4) and Site of Special Scientific Interest near South Woodham Ferrers. These European designated sites are particularly sensitive to increased visitor pressure, which may be caused by new residential development within the zone of influence, RAMSAR site (Figure 4) and Site of Special Scientific Interest near South Woodham Ferrers. These European designated sites are particularly sensitive to increased visitor pressure, which may be caused by new residential development within the zone of influence.

Britain when part of the EU and after lobbying by the British government was given special dispensation for the retention and use of certain imperial measures including the pint, miles and yards. There are others. This ruling still persists in the carried over legislation. Shops are still allowed to sell groceries in pounds and ounces. Distances on our roads are given in miles; speed limits are given in miles; vehicle speedometers are calibrated in miles per hour. It is illegal to have a speedometer calibrated in kilometres per hour for regular and normal use on British roads. The text stating; "Danbury is also within a **10km** zone of influence of the Crouch and Roach Estuaries Special

Protection Area must therefore be amended to the miles equivalent distance in order to convey a measurement with which the huge majority of the population are fully conversant with and which is fully understood.

As demonstrated by the figures in 2.30 the population of Danbury is getting older and those of age 60+ are the greater part of the population.

3.2 Extensive consultation undertaken through the Neighbourhood Plan, including a questionnaire delivered to every household in Danbury and which generated 639 responses (approximately 25% of all households in Danbury), helped identify key issues, challenges, and opportunities for consideration in the Plan.

639 responses out of a population of 5,200 is hardly a justification for identifying “key issues” from a questionnaire designed to give the right answers to questions which the originators wanted to justify. It only suggests that a minority of people responded to those questions whilst the majority refused to dignify leading questions designed to give a pre-determined answer.

3.4 A desire was expressed for more retail facilities in the Village, restaurants, and services such as a bank. The most popular additional recreational facility was a swimming pool.

Retail facilities and banks will locate where there are revenues to be earned and profits made. If those profits and revenues were to be made in Danbury then the Ironmonger; shoe shop; dress shop; butcher and baker would all still be here, but they are not. They are not here because the very people who are saying, “there should be more retail facilities”, did not use them because they were too expensive. It was more economical and there was more choice to be had by travelling to either Chelmsford, Maldon or beyond. There are 6 restaurants/eateries in Danbury already, 7 if you include Tea-On-The-Green. How many restaurants do these respondents want in what is still essentially a rural village? The Barclay’s bank at Eves Corner closed down because it was uneconomical to keep it open; a situation which underscores the opening line to this paragraph. A swimming pool is always predominantly mentioned, as it has been for years, by the very much younger element of the Danbury population who are a very distinct minority within a minority of respondents. It is not financially viable for Danbury to provide or maintain such an amenity at public cost. It is barely viable to keep the Sports and Social Centre afloat. All of the wants and desires mentioned could only ever be met with an extremely costly and unacceptable public subsidy.

3.5 The main concern expressed during the first stage of consultation was congestion on the A414 and increasing potential for rat running along the local lanes, many of which are narrow. The A414 is the main route between Maldon, Chelmsford, the A12 and beyond. With over 5,000 new homes planned in the Maldon District (see References), there is increasing concern about the impact on the A414 and local lanes. Whilst outside the scope of the Neighbourhood Plan, Danbury Parish Council continues to press for a solution to the volume of traffic on the A414.

There is not an increasing potential for “rat-Running”; it is already here and happening. This corner of England is already overburdened with housing which is being provided without the full and necessary infrastructure to support it. Danbury is being surrounded by intense development at Maldon, Boreham, Beaulieu Park and the proposal for a development bigger than Danbury and Little Baddow combined at Hammonds Farm. How is all of this additional population going to move

about? Do not delude yourselves that it will be on public transport, on foot or on cycles. Pretty well all of the additional transport needs will be via motor transport of one sort or another and it will be on the A414. Even if all of the extra vehicles are EV's they will still congest the local roads infrastructure.

3.6 Key issues identified for the Danbury Parish Area include:

- Congestion along the A414, leading to concerns about rat running along the local lanes.
- Parking problems, both insufficient parking within the village, and street parking leading to tail backs and danger to pedestrians. Despite the parking problems, residents gave mixed opinions about providing additional car parking (Supporting Documents 7 and 11).
- Pedestrian safety: footways are often narrow or non-existent, and there are insufficient crossings.
- Cyclist Safety.
- Environmental and Heritage Constraints: desire for continued protection for the countryside, open spaces, parks, woodland, and rural and protected lanes.
- Undersupply of allotments, amenity green space, park, sports and recreation grounds and youth play space (Supporting Document 22). There is a particular shortage of play space in the East of the village.
- Balancing growth with the desire to maintain a village feel and protect the rural character of the village. Danbury Neighbourhood Plan 24
- Desire for more amenities: a bank; shops; restaurants; a swimming pool.
- Undersupply of affordable housing.

“Cyclist Safety”!!!! Whenever did cyclists give a damn about the safety of pedestrians among whom they ride illegally on the footways and footpaths of our village? This comment is typical cyclist arrogance and selfishness. Even when they do ride on the roads they ignore the requirements of The Highway Code and deliberately ride in long lines making it impossible for the following traffic to get safely past and go about their legitimate economic activity. How about getting cyclists to properly pay their way and to consider other road users and pedestrians on the footways? Pedestrian safety is more down to selfish cyclists than it is to narrow or non-existent footways.

People are allegedly saying that they value the character of Danbury, but it is then claimed that they want to change that character as and when it selfishly suits them by installing footways along narrow rural lanes which will then become even narrower and difficult to negotiate for the legitimate vehicular traffic.

3.7 These key issues need to be considered alongside sustainability for the future and the need to:

- Find sites to accommodate around 100 homes as set out in the Chelmsford City Local Plan.
- Respond to the lasting impacts of the Covid-19 pandemic.
- Increase resilience and adapt to Climate Change, reducing our carbon footprint.

As already stated, there are no lasting impacts of the covid 19 situation other than in the heads of people who were taken in by the psychological manipulation in the first place. Read the NHS own statistics and learn the truth. There is nothing to respond to unless it is reversing the government indoctrination. Nor is there anything which can be done to combat climate change. It is happening now as it has been for millennia and it will go on happening. Reduce all the Co2 you like. Time and the future will show that it is all lies and will not make a blind bit of difference.

4.1 The vision for Danbury, which was strongly supported through consultation responses, is: Danbury in 2036 will be a flourishing village, separate from Chelmsford, with a strong community spirit, where people of all ages will be able to enjoy Danbury's unique character and identity. Its countryside, woods, multifunctional green infrastructure and green spaces will be protected, as will its heritage and distinguishing features of local character. Any development will be sympathetic to,

and not detract from, the character of the village, will be sustainable and appropriate to its scale and nature and be integrated with the landscape and existing housing. Opportunities will be taken to improve leisure, recreation, and retail facilities for residents. Danbury's geographical position within the area's road network is likely to continue to be a challenge and ways to improve this will be actively sought with other agencies over the plan period.

The consultation support is not strong as claimed it is a support from a truly small minority of the village. Will Danbury still be separate from Chelmsford in 2036, we seriously doubt it. Even if still separated by the A12 it will be an extremely large and urbanised conurbation with congested road links and traffic congestion; a place to be avoided. The current development in adjacent areas is already detracting from the established character and landscape of the village. The village already has more than adequate recreation and leisure facilities for residents, especially the younger element that has had additional facility created at the expense of green space. So much for protecting our local character and environment!!

"To improve Danbury's recreation and leisure facilities and increase provision where a shortfall exists". Where are these additional facilities to be accommodated without destroying more green land within the village envelope?

5 Housing and Development: To ensure there is a mix of house types, size and high-quality housing provision for all ages, which meets the housing needs of Danbury. It will also be appropriate to the scale and nature of the Parish, with the distinct and separate identity of Danbury retained. Green energy in new developments will be encouraged.

Before banging on about "green energy" in developments do the proper and correct research and arrive at the real answers about so-called green energy which in very truth is only ever generated by producing the Co2 which is so vehemently argued against.

5.5 All of the proposed development contravenes the ambitions of the Neighbourhood Plan in a variety of ways; principally in the area of access to Priority 1 or Priority 2 roads. The greatly increased level of traffic will inevitably have a detrimental effect on the adjoining areas of special quality, whatever their designated description.

1. The following sites are allocated for housing development within the Neighbourhood Plan area (see Figure 5 below) Site Name Approximate number of homes to be provided

Site A: Sandpit Field, East of Little Fields 10

Site B: Land at Tyndales Farm West 65

Site C: Ex Play Area, Jubilee Rise 2

Site D: Danecroft, Woodhill Road 14

Site E: Land at Copt Hill/Mayes Lane 2

Total development potential 93

2. Development will be permitted on the allocated sites subject to meeting the requirements of policies in the Danbury Neighbourhood Plan and Chelmsford Local Plan, having regard to the guidance contained in the Danbury Design Guide.

Interestingly the 2 houses projected for Site C will obliterate a children's play area in a well populated local residential area of the village. How does this accord with improving the recreational facility of the village?

Site A; The field to the east of Littlefields has long been held as an option for development and does make more sense than all of the others as it was earlier mooted that it was a site for around a 100 or so houses. The site would also give easier and ready access to the A414 thus directing traffic away

from already rat-run infested roads such as Woodhill Road. To site 14 more houses at Danecroft on Woodhill Road (Site D) would only intensify the level of traffic on Woodhill road and at a point on the road where visibility is restricted due to the bends and dips in the road.

Site E; Copt Hill is also a very narrow lane with dubious visibility of oncoming traffic in parts. It is incongruous in the extreme to introduce any additional traffic onto this narrow lane.

It is very easy to say that negative themes will arise and to then simply discount them because they don't suit what is wanted by Chelmsford.

Affordable housing is defined by the cost of the land on which the properties are to be built. With the current cost of land in Danbury the concept of truly affordable housing in Danbury is an illusory one as are all of the reasons given for justifying the proposed developments. Chelmsford is obliged to provide more housing by a government that is incapable and doesn't care about this or any other village environment. Thus the council contrive totally risible excuses as to why the proposed sites are workable even though in reality they are not.

5.50 Nor do the older local population want Danbury to become a younger persons 'playground' with all of the attendant noise, nuisance and disruption which would accompany a larger influx of younger people. The older population value the peace and quiet and tranquillity of Danbury as a rural village with extremely low levels of ambient background noise. Chelmsford has historically shown itself to be extremely reluctant to take action against untoward and excessively loud and intrusive amplified music and other noise nuisance. No-one is against balancing the demographic, but there are other considerations which are consequent downstream, but which are given no mention and are being ignored.

Sustainable Housing Design: Zero carbon emissions are an illusion which rely wholly on the mythology of carbon trade-offs. You are producing man-made emissions of carbon di-oxide, but you are not at the same time. It is time we stopped this nonsense about Co2 for good and all. When is Chelmsford going to provide the valid, attributable, proven and 100% sustainable and unsinkable evidence on which it has based its farcical 'Declaration of a Climate Emergency'?

People living in new houses want them to be as energy efficient as possible only because of the ridiculously high and artificially high energy and fuel prices which have been deliberately engineered by all western governments in order to raise revenues to pay for their disastrous covid expenditures which have cost the nation literally billions upon billions of pounds. Something like 16bn alone on PPE which was faulty, broken, out of date or no longer needed. It was all burned. So-called green energy is increasingly being shown to be not as green as it is claimed and heat pumps are inadequate to replace the full mains potential. Both Nottingham and Bristol have cost their Council Tax payers millions in failed green and supplementary energy schemes. Get off the unsustainable Co2 bandwagon and just ensure that people have energy efficient homes so that they can afford to live in them.

Built Form DNP4: 93 houses are never going to deliver the quite unsustainable claims for green roofs and walls. Simply build quality and energy efficient houses. You are never going to replicate the natural environment you will destroy.

5.63 To clarify expectations and reconcile local interest, consideration should be given to engage the local community by offering workshops at an early stage in the development process depending on the scale of development.

“Engage the local community”, or is it trying to persuade them why they must have what Chelmsford wants to impose on them against their wishes. If the council says this is what we really need, then be assured that it really isn’t.

6.10 The Environment Act 2021, coupled with the declaration of a Climate Emergency, has raised the importance of biodiversity and natural habitats. Planning applicants are strongly encouraged to submit a biodiversity net gain plan as part of development proposals. Net gain should ideally be achieved through on-site measures and be demonstrated through use of the Natural England/Defra Biodiversity Metric (see References). The greening of development sites can take a variety of forms and include the use of landscaping, green roofs, walls, and sustainable urban drainage systems. The Wildlife Trusts envisage creation of a Nature Recovery network, with greenery integrated into all development and resulting in a net gain for wildlife. It is proposed that nature is brought back into the places where people live their lives, also having a positive impact on health and wellbeing.

The above paragraph is absolute unfounded and unsustainable rubbish. Chelmsford is not empowered to declare a so-called climate emergency and even if it was so empowered it could not legitimately do so without providing the unassailable and bulletproof evidence to prove beyond any doubt that what it is claiming is true and totally sustainable, which it is not. Biodiversity and natural habitats are important and should not have their integrity compromised by the so-called multifunctional areas. This is nothing more than a euphemism for using green areas as a playground, usually for cyclists to take over and use to the detriment of the local environment under the guise of so-called green leisure activity. Green roofs and walls are a recipe for future slums as the people who occupy these dwellings do not want to adequately or properly maintain them. Make all south and south-westerly facing roof slopes out of photo-voltaic panels by all means so that the costs of energy consumption are kept to a minimum for occupants, but do not peddle the disingenuous nonsense about “bringing nature back into the places where people live”. This statement is little more than an excuse by the council to cut back on its civic duty to properly maintain the existing and future green areas where we already live and the area of Hoynors in Danbury is perfect evidence of this. What the council means by, “bringing nature back into the places where people live” is allowing grassed areas to grow unchecked such that they are unsightly, unhealthy for the residents because of the vermin and waste they harbour and unsafe for children to play on as they were once able to. There is no, “positive impact on health and wellbeing” by allowing this to happen, as the council currently does, in fact the reverse is true; people are seeing a deterioration in their health and wellbeing as they see their environment and their home area degraded causing them stress and mental anxiety. It does not and has not encouraged biodiversity in Hoynors or anywhere else. It has only created an appalling visual amenity, removed once valued facility and generally degraded the overall area.

It is well known that people move to Danbury for its green and open character, but once here they soon find that such an environment comes at a cost to their leisure-time and money in maintaining their gardens. The result is that existing hedges (wildlife corridors) are grubbed out and replaced with bland and featureless fencing. Lawns are killed off and covered over with ‘astro-turf’. The same will happen to the idealistic vision portrayed by the council because the prevailing societal attitude today is one whereby people do not want to maintain gardens and they will not do so. That undeniable fact coupled with the bigotry of the council in pursuing their idealism is a recipe for future slums and wholly unappealing areas in which to live. The entirety of this nature first vision is just hollow words which cannot be delivered upon long term even though it may be imposed upon an unwilling populace.

Wildlife Corridors DPN7:

Hedgerows are not a problem across farmland, but once again we see the council mind-set of living in an idealised world. As above, the problem with hedgerows is in the urban areas of the village where they are being removed hand over fist and replaced with fencing purely because they take time and effort to upkeep. The council itself only comes by and cuts back on the public side of hedges once a year if we are lucky and even then they leave the debris littering the rural footpaths for walkers to trip on. Words are cheap. The Essex Wildlife Trust doesn't own the remit for designating or suggesting wildlife corridors. The entire village of Danbury is a wildlife corridor, but where is the plan to ensure it remains so in the face of the assault from incomers previously used to living in a town-scape and not a rural village.

Open Spaces DPN8:

There is at present more than enough recreation/playground facility for the modest child and younger person population in Danbury and no more is required for the foreseeable future.

Recreational Pressure on Sites of Special Scientific Interest DNP9:

Mountain biking is unacceptable among pedestrians. These bikers are inconsiderate of the requirements of other people; they ride at speed in areas where they are not supposed to be because like all cyclists they consider themselves above any regulation; they have no respect for the landscape they are in; they genuinely believe they can do what they like for no better reason than that they are on a bike. For evidence of this witness the existing mountain biking on Danbury Common. Before the National Trust buckled and gave sanction to the unpermitted activity they would fill in the illegal earthworks and digging out on trust land which was continually carried on by these selfish bikers to enhance a natural depression. Eventually the National Trust did buckle and allowed mountain biking on this part of the Common only. The result of that naïve action instead of taking legal action against the bikers is now plain. They ride at speed on public footpaths as well as on the bridleways and thus put pedestrians, children, the elderly and infirm at risk. They also spread out from the common (where they do not confine themselves to the designated area) to make a nuisance of themselves on the public roads and also riding at speed on nearby narrow rural footpaths and footways. The same happens anywhere that cycling of any description is permitted. People would not be so antagonistic towards cyclists if they rode responsibly and adhered to regulations, but they do not. They appear to be psychologically incapable of doing so.

That the document contains the words, "footpaths are in poor condition/are being widened due to high pedestrian use, **and damage is occurring from mountain biking**" is testimony to the undesirability of this particular cycling activity. Far from encouraging it, measures should be enacted to prevent it from happening.

Light Pollution and Night Skies DNP10:

The problem with being in a naturally dark area is that one has also to enable security by IR activated security lighting. The issue is not with security lighting per-se, but with residents who perennially leave their outdoor security lighting on all through the hours of darkness and also with garden decorative lighting which residents also leave on even when it is not required. Such systems are generally not wasteful on energy as they are inevitably solar powered. Nor are the security lights wasteful if they are only activated when required by a moving heat source and they also are increasingly solar powered. Once again the main issue is not with public lighting which is subject to regulation, but with domestically controlled lighting which is not.

Trees & Hedges:

Leylandii and similar fast growing conifers should be outlawed for use in and around developments and for domestic planting as well. Homeowners should be supported and perhaps financially encouraged to remove existing Leylandii and to replace with a more acceptable species.

Landscape Character and Setting:

6.39 The parish still retains much of its rural aspect with arable fields and some sheep farming at its perimeter which contributes to the local economy and its valuable wildlife resources.

Developments such as Hammonds Farm which is projected to be bigger than Danbury and Little Baddow combined can only be regarded as a substantial threat to this accepted rural character. Sacrosanct green areas must be implemented around Danbury which are then kept free from development of any kind.

Key Views identified DPN12 :

6.40 Responses to the Residents' Questionnaire (Supporting Document 11) supported the protection of the seven key views listed below in Policy DNP12. A further 3 views were identified as valued but are either already protected or are less sensitive to development (further details below). The overall importance of the key views is that they show the character of Danbury as a hilltop village with views in all directions. They give a sense of place, space, and wellbeing

Who has decided that these are the only key views? We the residents of Danbury know better than any Chelmsford council official what are the salient and significant points of our village and what needs to be protected. It is obvious that anyone would agree that the seven views mentioned need protecting, but it is irresponsible to say that other views are less sensitive for no other reason than that it suits the planning and development ambitions of Chelmsford council supported by a government that doesn't care about what it desecrates as long as it is not in their own back yard.

7. Transport and Movement:

2. Proposals for major housing development (see Glossary) will be required to provide safe pedestrian and cycle connections within the site and connecting into the existing wider network and to Danbury's facilities, amenities, schools, public transport network and green spaces.

And what about safety for pedestrians in the existing areas of Danbury who are insulted and even threatened by cyclists when those pedestrians have the temerity to challenge them for riding illegally on both the footways and footpaths, ignoring the safety needs of pedestrians including the elderly and children and mothers with children in buggies. They also show no consideration whatsoever for other road users. When they ever do ride on the roads the requirements of the Highway Code for considerate cycling go out of the window. Cyclists are in reality outside the law as it is impossible to identify those who perennially cycle badly and without consideration.

5. New footways and footpaths should be capable of incorporating cycle routes where possible and be accessible to all vulnerable users.

What about vulnerable pedestrians. What is going to be done to constrain cyclists (and increasingly scooter riders) from ignoring every rule in the book and doing what they like with no fear of any sanction?

7.7 All along the A414 throughout Danbury, residents are subjected to levels of air pollution (including Nitrogen Dioxide). During 2018 to 2024, there was an Air Quality Management Area (AQMA) along the A414 between Eves Corner and Butts Lane in place where the National Air Quality Objective was exceeded (Figure 10). This was caused by the canyoning Danbury Neighbourhood Plan effect of tall buildings set close to the road, the prevailing wind direction and vehicles queuing up the hill towards Eves Corner (Supporting Document 19).

This is absolute tosh. To talk of “a canyoning effect of tall buildings between the very short stretch from Eves Corner to Butts Lane is quite ludicrous. Anyone who lives in Danbury knows that the wind blows strongly practically every day and soon disperses any vehicular emissions.

7.12 Away from the A414 Main/Maldon Road, Danbury is characterised by a number of local lanes and other roads that do not have footways. With the speed limits on these lanes varying between 40 and 60 mph, the proximity to traffic may deter residents from walking, opting to use the car instead for local journeys. Residents’ Questionnaire 2018, (Supporting Document 11) highlighted the need for additional footways when walking along busy roads. However, the provision/extension of new footways needs to be balanced with residents’ desire to protect the character of the local lanes.

Absolutely true!! These lanes are at the very heart of the character and soul of Danbury as a rural village.. This essential character must be protected. Many of the comments regarding footways are from incomers who do not fully appreciate the character of a rural village. Although some of the rural lanes do have 60 mph limits it is in practice not possible to drive at such speed because of the nature of the lanes.

7.13 There are 52 Public Rights of Way of various lengths and including Bridleways linking Main Road to areas North, South, East and West. Residents valued these but felt that more maintenance was required. In and around Danbury Common, an area popular with Mountain Bikers, there is anecdotal evidence of conflict between cyclists, horse riders and pedestrians.

Speaking as part of a household with whom such conflicts have occurred, primarily with cyclists it must be said, these reports are not anecdotal and we have in the past made several representations to the council, the police and the National Trust regarding the cavalier, ‘we can do what we like’ attitude of cyclists on Danbury Common. It is not sufficient for them that they are allowed to ride on the bridleways; they ride wherever they like and as always totally confident in their immunity from any sanction.

Table 2: Aspirations for Connectivity:

1. To Increase Sustainable Modes of Transport and reduce traffic flows by:
 - a) The Parish Council will seek to find strategies, in collaboration with other agencies, to improve public transport, cycling provision and safer pedestrian routes. This will encourage less dependence upon private cars, within the village and surrounding areas.
 - b) An offroad cycleway and footpath to the Sandon Park and Ride from Danbury.
 - c) A Park and Ride from Maldon through Danbury linking with the Park and Ride at Sandon to reduce single occupancy commuter traffic.
 - d) A combined cycle/footpath on the south side of the A414 within Danbury Park between Danbury Palace Drive and Well Lane to facilitate safe access to Danbury Park School and avoid cyclists slowing traffic on the steep hill.
 - e) Greater connectivity between existing bridleways and cycleways should be encouraged with creation of new routes; currently a high proportion lead to footpaths where illegal cycling is a danger to pedestrians.

f) Seek to protect the current permissive path from the water tower to the Danbury Leisure Centre.

g) To support opportunities to enhance and establish multifunctional green infrastructure along sustainable transport and PRow networks to both encourage active travel and create a green corridor for wildlife.

Cyclists are already a menace within Danbury Park and Danbury Lakes Country Park where they ride creating danger to those using the park facility . Any suggestion aimed at giving them any form of legitimacy is ridiculous. It is spitting in the faces of the people wishing to use the parks in safety and to walk at their leisure without being put at risk by these reckless and couldn't care less cyclists. This proposal will increase illegal cycling on the rural public footpaths and in turn put at risk the parents and children legitimately walking to Danbury Park School. It will also put at risk those using the footpaths to walk to the village centre, many of those users, given the age profile of Danbury, are older people who are in many instances infirm to a greater or lesser degree and hence not as agile in trying to evade the nuisance of selfish cycling which the Parish Council appear to be actively encouraging.

The best way to protect the permissive path (f) is to take measures to stop it being used by cyclists.

The Sandon Park & Ride is by definition a facility to which one drives, parks and then takes a bus into Chelmsford. Why is a cycle route even needed let alone being mooted? It is not necessary.

Provision of Recreational Facilities DNP14:

The frequent use of the respondents should not be confused with a response from all of Danbury residents. The questionnaire response was limited to say the least and the questions were slanted to obtain certain responses. As an example of the limited reach of the questionnaire, our household did not even receive one. To base the requirements of an entire village on such overtly fallacious and biased returns is unacceptable. The village of Danbury already has more than its fair share of recreation and leisure facilities for a variety of age groups and particularly the younger element. Presentations by the Parish Council to local schools have perennially thrown up the wish list from young children who do not properly understand the viability of what they might wish to see in an idealised world. The existing younger person recreational facilities are often under-used and any increase in facilities could only be described as designed to attract people from without the village and who owe no allegiance to the village or the facilities provided and such facilities are very sensibly not over provided in the areas in which they live. However, such unnecessary over-provision appears to be an objective of the unrepresentative and partisan Parish Council. Certainly a zip wire and a swimming pool are not either practical or viable and nor is the cost which would inevitably fall onto the council tax payers of Danbury which as is already recognised, getting older. There is no need for this unnecessary focus on expansion of recreation and leisure.

8.4 The Chelmsford Open Space study identified that Danbury has a shortfall in the provision of youth play space and sports and recreation grounds (Supporting Document 22). New recreational facilities have been installed at the Dawson Memorial Field in 2022 for older children. Some areas were underutilised, and by providing more facilities in these areas particularly for children, teenagers and young adults, could reduce the occurrence of antisocial behaviour.

Some areas are under- utilised. Very true, so you do not provide more that will also become under-utilised. There is no shortfall of youth play space. Where has this nonsense come from. There are 4 football pitches; a children’s playground; an adventure playground. There is the tennis club, the bowling club, the sports and social centre offering a variety of sports and activities. Far from reducing the incidence of anti-social behaviour, providing more not needed facilities will only attract more of the persons who create this anti-social behaviour as they seek out fresh venues at which to congregate. Something which was typified a few years ago by the erection of the so-called Youth Shelter adjacent to the lower car park , which we believe we are correct in saying became a venue for drug trafficking and usage.

9. Business and Economy:

“Objective To maintain existing businesses and encourage new economic growth and local employment opportunities, including working from home, to meet and support village needs”.

It is being increasingly understood that persistent working from home is not conducive to a good state of mental wellbeing. It is isolationist and devoid of other human interaction which is in itself a recipe for depression and other mental health concerns. If anything was proven by the covid situation it was that large scale and long term working from home did not and does not work for the betterment of either the individual or society. Businesses have left Danbury in the same way they have left other rural villages because it is not economically viable for them to thrive here. It should be recognised that Danbury in common with many other similar villages is no longer a quintessential English village in the sense of a local butcher, baker, grocer, post office and local church. The post office only remains by the good offices of the co-op and that village centre shop in which it is situated is almost certainly only there because of the business ethos of the co-op organisation. If there is an economic opportunity for businesses to locate in Danbury they will come to the village of their own accord. Danbury is a relatively well served dormitory village as are most urban communities in today’s Britain.

9.2 Opportunities to increase green energy will be sought, provided projects are in keeping with, and not detrimental to, the character of the area.

Preservation of the green and pleasant land which currently surrounds Danbury has been brutally scarred by the installation of the solar farms in the fields alongside the A414. Further so-called “green energy” cannot be provided anywhere within the Danbury village envelope without irreversibly and further damaging beyond measure the countryside which has already been acknowledged to be of such value to the residents and wider community for its unique character and landscape with sites of special significance and nature conservancy value. Do the research and so-called “green energy” is nowhere near as green as its advocates like to pretend it is when all of the factors such as manufacture, land use required, farmland taken out of food production, maintenance, essential lubrication and eventual disposal at end of service life are all factored in. So-called green energy, like electric vehicles, is no more green than any other form of energy generation and in actuality probably less so.

New Employment Development DNP16:

5. The retrofitting of existing employment uses to include renewable energy technology will be supported.

And what about the “impact on the local living environment and the amenity of any adjacent residential properties or other land users” created by the use of so-called “renewable energy”?

7. Proposals for new developments or expansion of existing properties should be capable of receiving high speed and reliable mobile and broadband connectivity. Proposals will be supported where the appropriate cabling and ducting is provided to the premises and linked to infrastructure networks, enabling the fastest available connections. Where connectivity is not currently available suitable ducting that can accept gigabit broadband, fixed line gigabit-cable broadband and/or 5G connectivity should be provided to the public highway or other suitable location.

This paragraph illustrates a clear lack of understanding of modern communications technology by the author. It is superfluous and unnecessary.

9.7 The main businesses areas and retail areas are shown in Figure 18. There are at least 98 businesses operating throughout the village which have led to Danbury being a Key Service Settlement. Danbury provides a range of key services, for example:

- Primary schools.
- Local employment opportunities.
- Convenience shopping facilities.
- Community facilities.
- Good public transport links.
- Danbury Medical Centre.

Everything provided in Danbury is readily available elsewhere and easily reached in either Chelmsford or Maldon and more often than not at a more economical cost including travelling. To describe Danbury as “a Key Service Settlement” is being disingenuous in the extreme. It is convenient to have these facilities available when they are needed in short order, but the exodus of services and facilities from the village over the years emphasises the incorrect emphasis placed on that description.

The village offers employment opportunities only where the income derived is not to be considered that of the main family or household income.

The convenience shopping facilities are limited and expensive when compared to shopping elsewhere.

The community facilities are average.

The public transport links are awful and expensive.

The Medical Centre has acquired an unenviable reputation which is hardly surprising when considering that Danbury patients are sent to Springfield and Springfield patients are sent to Danbury. Check out user reviews on Trust Pilot; they are not at all complimentary.

Additional Business Areas

- Fuel and farming supplies on Hyde Lane (not in map boundary).

Table 5: Aspirations for Business and Economy

1. The Parish is keen to identify opportunities for small scale, community led and owned green energy projects to support local residents and businesses.
2. Designation process is ongoing for Bell Works, Well Lane industrial estate as a business zone.
3. The creation of a Danbury Business Hub was supported by 75% of respondents to Questionnaire number 2 (Supporting Document 11). This could provide meeting space, shared

workspace and photocopying/printing services for small, local businesses and residents. Currently, Danbury Library provides access to the internet and a photocopier.

Please understand and realise that there is no such thing as green energy. It is fallacious to consider the end product output without also considering what has contributed to its origin. This paragraph is so risible it does not merit any further comment.

11.9 Chelmsford City Council will organise the referendum. All people of voting age in Danbury are eligible to vote on whether the Plan should be brought into force ('made') or not. If more than 50% of all people who turn out, vote in favour of making the Plan, then it will become part of the suite of planning policies used by Chelmsford City Council to help shape and determine planning applications in Danbury

This is fundamentally undemocratic. If only 5 people turn out to vote and 3 vote for or against and two vote in the opposite way the referendum is carried or lost on the basis of a ridiculously small number of the population. Any referendum must be by direct consultation with ALL village residents of voting age and the threshold for acceptance raised from 50% to e.g. 65%. The whole country now understands the divisions and arguments which still rage over the Brexit referendum result consequent on the extremely narrow margin in favour. A similarly narrow result either way would have the same result in Danbury and would always remain open to question. Any result must be decisively in favour or not in favour so that the argument is settled. A 51%-49% result of only those that bother to turn out is not democratic, it is not viable as an effective mandate and it is not sustainable as a platform for the future.

Comment

Consultee Mrs Nicola Ware (1359397)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mrs Nicola Ware (1359397)

Comment ID DNP-79

Response Date 16/06/24 20:39

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Submission Type Web

Version 0.3

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site B: Land at Tyndales Farm West

Question 2

Please add your comments below

I strongly object to the plan to build 65 new houses at Tyndales Farm West, Danbury.

This is a beautiful part of Danbury, currently used for agriculture and enjoyed by many locals using the popular footpaths. The area is full of wildlife and is the start of the ever-decreasing countryside between Danbury and Maldon.

A large housing estate is completely unsuitable for this location, right on the already congested A414; with all the extra traffic coming through from Maldon, there is now a traffic jam the whole way through the village every day during rush hours. This then causes rat-runs through the small country lanes and residential roads around the A414, many of which don't have pavements, and therefore causes danger for pedestrians, particularly children walking to school/bus stops in the morning.

Danbury cannot sustain this type of development, the infrastructure is simply not in place to support hundreds more residents and cars. With large-scale developments such as this, the character of the village will be destroyed.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Agent Jacqueline Murrells (1359396)

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Consultee

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Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Jacqueline Murrells (1359396)

Comment ID DNP-80

Response Date 16/06/24 20:53

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Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Page 39 - Site D: Danecroft, Woodhill Road

Question 2

Please add your comments below

I would like to object strongly to the proposal on the Danbury Neighbourhood Plan to build 14 houses in the garden of Danecroft – Area D. I do not believe 25% is a true representation of the views of Danbury residents and some of those 25% may have moved away in the intervening years since the initial consultation.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

**If you wish to submit any supporting information, [Danecroft objection.docx](#)
please upload it here**

A previous application for 14 houses on this site was refused by Chelmsford Borough Council with the following statement:

The site lies within a Special Landscape Area in the adopted Chelmsford Rural Areas Local Plan. Policy NR12 states that there is a presumption against development unless its siting, design, materials and landscaping accord with the character of the area in which the development is proposed. The proposal would be contrary to this policy. The size and shape of the site would not permit development of a standard compatible with that existing in the area and in consequence the proposal would be detrimental to the visual amenities of the area.

The site is directly adjacent to a conservation area and is on an elevated position with a gradual incline. The large property previously built on the plot – Danecroft – dominates the view very prominently. The new buildings would have to be very closely packed and from a higher perspective would overlook the properties along Woodhill road. The new houses would also be visible behind the listed building – Poplars - and be extremely detrimental to the view of the Cricketers green from Sporehams Lane. With many old and interesting houses all along the road from the Cricketers to Danecroft, any new buildings showing from behind would not be in keeping and would have a negative impact on this vista which many would agree is the best view in the village. The proposed development would also impact greatly on the view from the church meadow which has views across to Hanningfield reservoir.

A previous application for 4 houses on the plot was refused for the following reasons as well as many others.

*Core Strategy Policy CP5 The application site is located within the **rural area**, beyond the Defined Settlement boundary of Danbury and as such the proposal for new residential development is unacceptable in principle. The application therefore fails to comply with Policy CP5.*

Development Control Policy DC2 seeks specifically to control development in the countryside beyond the Metropolitan Green Belt and states that within the rural area the countryside will be protected for its own sake, particularly for its landscapes, natural resources and areas of ecological, historic, archaeological, agricultural and recreational value. Planning permission will be refused for development within the rural area except for where the proposal is for one of a number of prescribed purposes. The provision of new dwellings for private use is not one of these prescribed purposes and as such the proposal fails to comply with Policy DC2.

*Development Control Policy DC4 Protecting Existing Amenity - All development proposals should safeguard the amenities of the occupiers of any nearby properties by ensuring that development would not result in excessive noise, activity or **vehicle movements, overlooking or visual intrusion and the built form would not adversely prejudice outlook**, privacy, or light enjoyed by the occupiers of nearby properties*

*Development Control Policy DC17 Conservation Areas - Sets the criteria for development proposals in Conservation Areas which must **preserve or enhance the character or appearance of the Conservation Area**.*

Development Control Policy DC42 Site Planning - Planning permission will be granted for development proposals where the site planning and design of building spaces arranges access points, routes within the site, public and private spaces, building forms and ancillary functions in an efficient, safe, workable, spatially coherent and attractive manner,

*incorporates existing site features of value and **does not cause unacceptable effects on adjoining sites, property or their occupiers.***

I am not aware whether or not these policies are still adhered to but their content certainly still applies.

There is also the issue of access. With 14 properties, one can assume 28 vehicles. The access is on a blind bend on a road with a 40 mile an hour speed limit. This is a very busy road especially during rush hours and there is already a danger for vehicles pulling out onto this road with many bends.

From the consultation residents wanted the village to remain as it is, valuing the countryside, **open spaces, rural lanes** and its rich **heritage assets**.

There appears to be conflict within the Danbury Neighbourhood Plan as the proposed development directly conflicts with its own objectives:

*Environmental and Heritage Constraints: **desire for continued protection for the countryside, open spaces, parks, woodland, and rural and protected lanes.***

*Not cause harm to the setting of **SSSIs, Heritage Assets and Conservation Area.***

*Not cause harm to the environment, including **important views, designated open green spaces, valued landscapes, residential amenities or habitats.***

The proposed site has a varied wildlife including badgers, owls, bats, foxes, squirrels, muntjaks and foxes that I have seen for myself as well, undoubtedly, as others I have not yet seen. In order to cram 14 houses onto this space, not only will their habitat be lost but also the few remaining trees that have not already been removed, will need to go.

Danbury Parish Council objected to 4 houses being built on this plot in 2010 for the following reasons:

- 1. This backland development outside the defined settlement represents creeping urbanisation and will **detract from the rural character of the area** contrary to policy DC12;*
- 2. The **loss of habitat** will have adverse effects on local wildlife, which includes foxes, badgers, squirrels, bats and many species of bird;*
- 3. There will be a loss of **visual amenity and privacy** of neighbouring residents, contrary to policy DC4, **especially as the land rises** towards the proposed building location;*
- 4. The soakaway is likely to be inadequate leading to an **increased risk of flooding**, especially if trees are removed;*
- 5. The **increase in traffic at a junction which already presents problems** is contrary to policy DC43. The proposal under 10/00103/FUL will not resolve the issue.*

These are all valid reasons to object to building on the site and, again, those reasons have not gone away!

I appreciate that more houses need to be built in the village but feel there are more appropriate sites for them. For example, the proposed site A adjacent to Littlefields could be bigger – this has direct access to the main road and could extend backwards behind Runsell View. Site B could also be extended as there is already a housing estate – Barleymead. Extending existing housing estates would have far less impact than infilling our green spaces.

Comment

Consultee Mr Stewart Heath (1359458)

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Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mr Stewart Heath (1359458)

Comment ID DNP-82

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Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site Danecroft 14 (D14), Woodhill Road, Danbury, Essex

Question 2

Please add your comments below

I object to the proposal for development at Danecroft, site D14 for the following reasons:

This site was refused planning permission in 1989 and 2010 as the proposals were contrary to Local Plan core strategy and Development Control policies at the time. The 2010 application was refused on the grounds of CP5; DC2. The decision also took into consideration policies CP4; DC4; DC7; DC17; DC24; DC40; DC42; DC44; DC45. These policies have been updated and are still relevant in the current adopted Local Plan. Therefore, I question why this site is being proposed for development as part of the Danbury Neighbourhood Plan as it will not meet the requirements of the current adopted Local Plan.

Site Options and Assessment Report

Table 11 states that although acceptable on highway grounds, which I question in relation to siting of the access in close proximity to a bend and incline, and that the planning permission is in relation to existing and possibly 4 additional properties not 14 as proposed in the DNP, the development of this site to the capacity proposed would have an impact on the highway, landscape and ecology.

Table 12 rates the site as amber on the RAG so will require a high-level of mitigating of constraints which may result in the site being un-viable on financial grounds.

The site location

Danecroft is outside of the Designated Settlement Boundary and is not identified in the

current adopted Chelmsford City Adopted Local Plan.

Site Density

DNP proposes the site to be developed with 14 properties. If the owner's proposal is for 4 properties, as per the planning application for improved access, then there would be a short fall of 10 new dwellings, approximately 10% of the identified housing need for Danbury.

This would mean that the development of this site is of little benefit to the DPN housing need.

Site access

The access is proposed to be from Woodhill Road which has a 40mph speed limit. It is also in close proximity to a bend and incline. Whilst I understand planning permission has been granted for improvements to the access, the permitted planning application (17/00714/FUL) has now expired, so a new application will be required. The permission was granted on the grounds that it was to improve the access for the existing dwellings and for an additional 4 properties, subject to planning permission, not to accommodate an additional 14 houses and the associated additional vehicle movements as now proposed.

Proximity to existing properties

While the draft plan refers to existing neighbouring properties on Woodhill Road and the public house to the east no consideration is given to the large number of properties that are on the western boundary, one of which is mine.

From previous submitted planning applications, the layout of the site would mean that all the properties on Woodhill Road would be facing side elevations of new properties, but those on South View Road would be facing the rear elevations which would be very intrusive to our privacy.

Policy DNP2

DNP2 advocates the development of bungalows. I would propose that if this site is included in the DPN and review of the Chelmsford City Local Plan and is granted planning permission, that it is restricted to bungalows which would have less of an impact on surrounding properties and be less intrusive to the existing views and privacy of neighbours.

DNP5

The development at Danecroft is contrary to DNP5 in that it infills what is currently an open view for neighbouring properties, especially those in South View Road. Also, the development splits the garden and land around the existing dwelling.

DNP5 refers to preserving the openness of Danbury, any existing small gaps between buildings or structures should, as far as possible, remain, so as to retain these views and character of the area. Where new development is planned, applicants should have regard to the importance of these views and the general openness of the area and create spaces or gaps in such a way that they can remain so in perpetuity and not be subsequently developed or infilled.

Splitting of gardens and back land developments should be avoided as both destroy the open contribution these make in all 6 of Danbury's main residential localities.

One of Danbury's characteristic features that is highly valued by residents is the sense of openness and green space in the street scene.

DNP8

The site D14 is outside of the settlement boundary and in close proximity to both a designated heritage asset and a SSSI. The draft neighbourhood plan also states that all three SSSI sites are under pressure, the development at Danecroft would increase this pressure especially on the nearby SSSI to the south of the site which will be easily accessed by new residents and visitors.

This is contrary to DNP8 Development proposals resulting in the loss of open space, especially within or adjoining the Conservation Area which would cause harm to the character of and their significance to the village will not be supported.

Danbury's open spaces are highly valued and contribute to the rural character and village feel.

DNP10 Light Pollution and Night Skies

Bats have been seen in the area and are known to use the tree / hedge line to the west of the site.

DNP10 states that Any lighting scheme must not impact negatively on local residents and on areas of ecological value including woodland and green spaces – specifically near habitats used by bats and other light-sensitive protected species.

DPN12 Danbury Key Views Identified

The development at Danecroft is contrary to DPN12 as it compromises Key View 10 shown on figure 14 as it is in direct line of sight from the view point in South View Road properties which currently enjoy

the view across the green open space to Hanningfield Reservoir.

Chelmsford City Adopted Local Plan Policies

Strategic Growth Site Policy 13 – Danbury

Policy 13 masterplan principals state that developments should conserve and enhance the SSSI in and around Danbury, ensuring any new development avoids direct impact and mitigates indirect impact (i.e. recreational damage) as a priority and provides any required mitigation measures where necessary (including those set within any emerging visitor impact studies / strategic solutions).

The draft neighbourhood plan does not refer to this policy in relation to the proposed site D14 (Danecroft) which will have an impact on the SSSI to the south of the site with additional visits from new residents and their visitors. It only states that advice should be sought from Natural England.

The NP does not have any mitigation plans for the impact of visitors and new residents on the SSSI sites.

Policy DM29 - safeguards the living environment of the occupiers of any nearby residential property by ensuring that the development is not overbearing and does not result in unacceptable overlooking or overshadowing. The development shall also not result in excessive noise, activity or vehicle movements;

The development at Danecroft is contrary to policy DM29 in that it will be overbearing to my property which is a bungalow, will overlook my garden and ancillary domestic buildings, and inhibit the current use and enjoyment of the open space. The development will also bring additional noise and activity to the vicinity of my property in South View Road and inhibit the view across the open space towards the protected view of Hanningfield Reservoir.

Noise pollution is already an issue for residents in South View Road when events are held at the Cricketers Pub to the east of Danecroft.

The site at Danecroft is outside of the Defined Settlement Boundary therefore is contrary to DM2.

There is no information on what type of housing is to be provided. To be in line with DM2 the development should deliver affordable housing the draft Danbury Neighbourhood Plan does not specify this.

DM9

This policy states that the infilling is limited so as not to impact unacceptably on the function and purpose of the Green Belt; and the development does not detract from the existing character or appearance of the area.

The development of Danecroft would detract from the existing character and appearance of the area by removing open green space and views across the neighbouring green countryside.

DM8

This policy states that the development should not adversely affect or have a visual impact on the identified intrinsic character and beauty of the countryside compared to the existing; and the impact of the activities/use of the new development should not impact on neighbouring properties compared to the existing.

The Danecroft development would have significant impact on surrounding countryside and neighbouring properties.

DM29 – Protecting Living and Working

i. safeguards the living environment of the occupiers of any nearby residential property by ensuring that the development is not overbearing and does not result in unacceptable overlooking or overshadowing. The development shall also not result in excessive noise, activity or vehicle movements; and

ii. is compatible with neighbouring or existing uses in the vicinity of the development by ensuring that the development avoids unacceptable levels of polluting emissions by reason of noise, light, smell, fumes, vibrations or other issues, unless appropriate mitigation measures can be put in place and permanently maintained.

The development of the land at Danecroft will impact nearby residential properties, will be overbearing and have unacceptable overlooking and overshadowing, not only for the resident's enjoyment of their homes and gardens, but all so for those who work from home which is very common today. They will be subject to noise, light and other activities from the new dwellings that they do not experience now impacting on their living and working environment.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mrs Janet Reid (1359502)
Email Address
Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation
Comment by Mrs Janet Reid (1359502)
Comment ID DNP-83
Response Date 17/06/24 17:02
Status Processed
Submission Type Web
Version 0.3

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site D: Danecroft, Woodhill Road

Question 2

Please add your comments below

I believe that the proposal to build 14 houses on this site is unsupportable, particularly as permission to build 4 houses was recently refused. My reasoning is as follows:-

- . Access and egress is situated on a blind bend.
- . The traffic restriction is already insufficient at 40 MPH on a heavily used country road with multiple dwellings.
- . An accident is waiting to happen due to the one very narrow and inadequate footpath.
- . Woodhill Road is used as a rat- run due to the increased heavy traffic and many hold-ups on the main road through Danbury. 14 new houses and the accompanying cars on a blind bend is not a good prospect.
- . Danbury Common is an area of outstanding biodiversity. There are rare plants, pipistrelle bats, deer, dormice, newts, toads, frogs and many more species. The house now standing on the area of proposed development is surrounded by land which at present accommodates much of these. All will be endangered if 14 houses are allowed.

.
.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mr Lee Caswell (1355909)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mr Lee Caswell (1355909)

Comment ID DNP-84

Response Date 17/06/24 21:05

Status Processed

Submission Type Web

Version 0.4

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site B: Land at Tyndales Farm West

Question 2

Please add your comments below

I strongly object to the proposed 65 houses that would destroy this lovely area forever. It seems obvious that adding an extra junction on the A414 will also have a large impact on this already very busy road, causing more tailbacks , accidents , potential fatalities , all of which could be avoided. I have concerns about how many cars will turn off at this new junction and divert along to Hyde Lane, as we already have a considerable number of cars that use Hyde Lane as a 'rat run' in busy periods to avoid the A414 through the centre of Danbury. This will have a large impact on these rural characteristic lanes. If this proposal goes ahead, we are further depleting the numbers of endangered animals. I have inspected the survey mats left on the edge of the field and there are slowworm's along with other insects that thrive on this land. If these inspection mats were laid away from the road there would be an abundance of little thriving insects that would choose to be away from the main road. There were traps left for field mice in winter which was maybe not the best place or time to be left due to hibernation. There are so many wild animals that live in this field including Owls , Badgers , Deer , Mice , Hedgehogs, and there habitat will be destroyed with this development. There has been enough development in the surrounding area around and we have to look elsewhere.

We must protect our wildlife , crops and land for future generations.
Please , Please look at alternatives

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mrs Kate Churchouse (1357160)
Email Address
Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation
Comment by Mrs Kate Churchouse (1357160)
Comment ID DNP-85
Response Date 17/06/24 20:53
Status Processed
Submission Type Web
Version 0.3

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site Plan B: Land at Tyndales Farm West

Question 2

Please add your comments below

I appreciate the enormous amount of work that went into creating this neighbourhood plan. Finding sites for 100 houses within the village boundary as required was an impossible task. I would like to object to the development proposed near Tyndales however which would change the nature of the village. This is a lovely field where we have successfully fought off a potential gravel pit in recent years. Danbury is surrounded by wildlife and is a beautiful rural village, scarcely coping with the traffic through it. The infrastructure cannot cope with more houses, especially the Medical Centre. It should not be extended for more housing which I feel should be on brownfield sites not within Danbury itself.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mr Nick Harvey (1359614)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mr Nick Harvey (1359614)

Comment ID DNP-86

Response Date 18/06/24 09:17

Status Processed

Submission Type Web

Version 0.3

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site A land adjacent to Little Fields

Question 2

Please add your comments below

Current plans for Access is not possible, the land is privately owned and in constant use.
The land homes various wildlife including badgers & bats.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mr Matthew Parsons (1355280)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mr Matthew Parsons (1355280)

Comment ID DNP-87

Response Date 18/06/24 09:19

Status Processed

Submission Type Web

Version 0.3

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site B: Land at Tyndales Farm West

Question 2

Please add your comments below

Building housing on the proposed field in one of Essex's finest villages presents a myriad of significant concerns that underscore why this location is unsuitable for development. The proposal not only threatens to disrupt the character and charm of the village but also raises serious practical issues regarding infrastructure and quality of life for current and future residents.

Lack of Supporting Facilities

The surrounding area lacks the necessary facilities to support an influx of new residents. The village's existing infrastructure is designed to cater to a smaller population, and it is already operating near capacity. Essential services such as schools, healthcare facilities, and retail outlets are limited.

- **Schools:** Local schools are already struggling with capacity issues. An increase in population would likely result in overcrowded classrooms, diminished educational quality, and longer waiting lists, making it difficult for families to secure places for their children.

- **Healthcare:** The nearest medical facilities are already overstretched. Additional housing would put undue pressure on these services, leading to longer waiting times for appointments and reduced access to essential healthcare.

- **Retail and Leisure:** The village has a small number of shops and recreational facilities, which are barely sufficient for the current residents. Additional housing would result in increased demand, leading to overcrowding and a decline in the quality of available services.

Excess Traffic

The proposed development would significantly exacerbate traffic congestion in the area. The village's roads were not designed to accommodate high volumes of traffic, and an increase in the number of vehicles would lead to several problems:

- **Congestion:** The narrow, winding roads typical of this picturesque village would become choked with traffic, especially during peak hours. This would not only frustrate residents but also pose safety risks.
- **Road Safety:** Increased traffic heightens the risk of accidents, particularly in areas close to schools and pedestrian crossings. The village's roads are not equipped to handle heavy traffic safely.
- **Environmental Impact:** More vehicles on the road mean higher emissions, contributing to pollution and negatively affecting the air quality and health of residents.

Devaluation and Overdensity

Developing housing on the proposed field would lead to overdevelopment, fundamentally altering the village's character and devaluing the area:

- **Loss of Green Space:** The field is likely a valued green space, contributing to the village's scenic beauty and providing a habitat for local wildlife. Building on it would diminish the village's natural appeal, reducing the quality of life for current residents and devaluing properties.
- **Overdensity:** Introducing a large number of new homes would lead to an overpopulated, dense environment. This overdevelopment could create a sense of claustrophobia, replacing the village's tranquil, spacious feel with congestion and crowding.
- **Property Values:** The increased density and loss of village charm would likely lead to a decline in property values. Prospective buyers may be deterred by the overcrowding and lack of amenities, reducing demand and driving down prices.

Preservation of Village Character

Essex's finest villages are known for their unique charm, historical significance, and peaceful living environments. Preserving these qualities is essential for maintaining the identity and appeal of the area.

- **Cultural Heritage:** Many villages in Essex have historical significance and unique architectural styles that attract both residents and visitors. Overdevelopment could lead to the erosion of this cultural heritage.
- **Community Spirit:** The village likely enjoys a close-knit community atmosphere, which could be undermined by a large influx of new residents. Maintaining a manageable population size is crucial for preserving this social fabric.

In conclusion, building housing on the proposed field would not only strain the inadequate facilities and exacerbate traffic problems but also lead to overdevelopment and devaluation of one of Essex's finest villages.

It is crucial to preserve the unique character, natural beauty, and quality of life in the village by opposing this development. The focus should be on sustainable growth that respects and maintains the village's charm and ensures that any development is supported by appropriate infrastructure improvements.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Emma Sexton (1359657)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Emma Sexton (1359657)

Comment ID DNP-88

Response Date 18/06/24 10:49

Status Processed

Submission Type Web

Version 0.3

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site B: Land at Tyndale Farm West

Question 2

Please add your comments below

I strongly object to the proposed development. As a resident living directly opposite the proposed plot, I am deeply concerned about the severe negative impacts this project will have on our local area. The addition of 65 new houses will significantly increase traffic. Currently, the A414 through the village is already heavily congested, often resulting in long queues. More vehicles from the new development will worsen this issue, causing even longer delays and potential gridlock. Increased traffic will turn Cherry Garden Lane into a de facto bypass as drivers seek alternative routes to avoid the backed-up main road. This small road is not equipped to handle the substantial influx of cars and already suffers from large potholes. The current state of the road infrastructure cannot support the increased wear and tear, leading to rapid deterioration, safety risks, and costly repairs. The environmental impact is another critical issue. Additional cars queuing on the A414 and diverting through Cherry Garden Lane will significantly raise pollution levels. Given the narrowness of Cherry Garden Lane, any increase in traffic will result in a concentrated rise in harmful emissions. The proposed development site is currently farmland, which supports local wildlife and maintains the rural character of our community. Losing this green space will detrimentally affect the environment and local wildlife habitats. Additionally, this field is a cherished area for local residents who use it for recreational activities such as dog walking. It would be devastating to see this natural and communal resource ruined by overdevelopment.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Sandra Green (1358507)
Email Address
Company / Organisation National Trust
Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation
Comment by National Trust (Sandra Green - 1358507)
Comment ID DNP-89
Response Date 18/06/24 10:40
Status Processed
Submission Type Web
Version 0.2

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Policy DNP9

Question 2

Please add your comments below

The National Trust was founded in 1895 as an independent charity to hold and manage, in perpetuity for the benefit of the nation, countryside and historic buildings in England, Wales and Northern Ireland. The Trust fulfils its statutory responsibilities as laid down in the National Trust Acts, through ownership and direct management of the properties in its care. It is within the remit of the National Trust to comment where development proposals may affect our land or property, or other special places. The National Trust acknowledges the proposed housing allocation sites for around 100 new homes within or adjoining the village, set out in the Submission Neighbourhood Plan in order to meet an identified housing need. It is noted that Danbury is defined as a 'Key Service Settlement' in both the adopted, and emerging Chelmsford Local Plan, and that it forms part of an identified Growth Area. Blake's Wood and Lingwood Common (located to the north of Danbury) together with Danbury Common (located to the south of Danbury) are designated as Sites of Special Scientific Interest and are owned and managed by the National Trust. The sites are woodland areas with some visitor infrastructure. These sites currently receive high levels of footfall and our Rangers are noticing that physical damage is occurring, particularly in the fragile ancient woodland ecosystem, as well as within recreational areas such as the mountain bike area at Danbury Common which is within the SSSI. The sites experience

significant numbers of walkers and mountain bikers at peak periods such as weekends and bank holidays. These visitors are deviating from the PROW leading to poaching of the path network, soil compaction (particularly of the more fragile ancient woodland soils), and trampling of ground vegetation. The car parking facilities are often at capacity during these times and in most locations adjacent public highways such as narrow lanes are regularly used for overspill parking on fragile verges (many are ancient wood banks). The Blakes ancient woodland is getting trampled and the woodbanks destroyed by parked cars on any given weekend.

It is the Trust's view that these sites will become more vulnerable as a result of the cumulative effect of more visits from the proposed allocation of around 100 new dwellings. The Trust is of the opinion that the additional development would result in increased recreational pressure upon land within our ownership.

The Trust is pleased that the recreational pressure on its sites is recognised and mitigation measures are to be sought for sites of more than 10 houses through Policy DNP9 Recreational Pressure on Sites of Special Scientific Interest. DNP9 incorporates Natural England's suggested wording in its response to the Regulation 14 Draft plan. Point 4 states Developers will work closely with representatives from Danbury Parish Council, Natural England and the SSSI site managers (National Trust and Essex Wildlife Trust) to assess recreational pressure and provide mitigation, by forming an oversight group at the outset.

Whilst we support the policy requirement for developers to work closely with the Trust and other parties to agree suitable solutions to development pressures, the resource and financial costs to enable the Trust to meaningfully engage with this process can be significant. The Trust requests that the text within policy DNP9 be amended to: 4. Developers will work closely with representatives from Danbury Parish Council, Natural England and the SSSI site managers (National Trust and Essex Wildlife Trust) to assess recreational pressure and provide mitigation, by forming an oversight group at the outset.

The scope of the parties' involvement is to be agreed between the parties and the developers at an early stage in the preapplication process. Costs incurred will be covered by the developers by financial arrangement with the individual third parties, as appropriate.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Gordon Hudson (1359685)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Gordon Hudson (1359685)

Comment ID DNP-90

Response Date 18/06/24 11:31

Status Processed

Submission Type Web

Version 0.3

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site D: Danecroft, Woodhill Road

Question 2

Please add your comments below

I would like to register my objection to the development of 14 Houses proposed for the Danecroft property in Woodhill Road.

I believe that the proposed development would be damaging to the safety and wellbeing of the local community. Previous applications for development on this site were rejected on completely justified grounds and the circumstances that led to these rejections have only been further exacerbated by the huge influx of road traffic resulting from the development of Maldon Town. Woodhill Road has become a rat-run for traffic from Maldon to and from the A12 that has increased road risk in what is a narrow country road. The associated risk to wildlife, pedestrians and cyclists will only increase with any further expansion of housing.

The property in question has very poor access and visibility onto Woodhill Road. The proposal will exponentially increase risk to road users and pedestrians alike. There is no adequate proposal for mitigation of these risks.

Additionally, the Danecroft property has a number of well established trees, including Oak trees that provide habitat for bats and other species that would be impacted by the development.

The addition of 14 additional houses would also have a significant impact of the sewerage and water table in the area that is currently struggling to deliver adequate services to the existing housing stock.

In summary, I see no justification for the placement of 14 additional properties at this location and object in strongest terms to the proposal.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Toni Caswell (1359702)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Toni Caswell (1359702)

Comment ID DNP-91

Response Date 18/06/24 12:29

Status Processed

Submission Type Web

Version 0.3

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site B: Land at Tyndale Farm West

Question 2

Please add your comments below

I am writing to formally object to the proposed housing development at Site Plan B, Land at Tyndale Farm West. This development poses significant threats to the natural environment, local wildlife, and the quality of life for the residents of our village.

The area in question is home to a diverse range of animals and insects that have thrived in this habitat for many years. The destruction of this green space would not only displace these species but also lead to a loss of biodiversity that is crucial to maintaining ecological balance.

Additionally, this green area is a cherished space for local residents. It is where we walk with our children and dogs every day, contributing to our physical and mental well-being. The loss of this area would irrevocably damage our lifestyle and the community's connection to nature.

The proposed development would also lead to a significant increase in pollution throughout the village. With an estimated increase of at least 100 cars, the risk of accidents, including fatalities on the already busy A414, would be heightened. Hyde Lane, which is already used as a rat run, would see even more traffic, further degrading our rural country lanes and compromising safety.

There is no justification for building 65 houses on natural farmland. This proposal appears to have little regard for the environmental and social costs. If new housing is necessary, it should be constructed on land that is more suitable and less damaging to our environment, ensuring that future generations can enjoy the same natural beauty and quality of life that we do.

In conclusion, I strongly urge the planning committee to reconsider this proposal. Protecting our natural environment and preserving the character of our village should be the priority.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Agent Rory Kyle (1353120)

Email Address

Address

Consultee Rory Kyle (1358211)

Email Address

Company / Organisation Landvest Developments Limited

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Landvest Developments Limited (Rory Kyle
-1358211)

Comment ID DNP-92

Response Date 18/06/24 14:07

Status Processed

Submission Type Web

Version 0.5

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Paragraph 5.4, Draft Policy DNP1 and Draft Policy DNP21 (now DNP17).

Question 2

Please add your comments below

Please see submission letter

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

If you wish to submit any supporting information, please upload it here

[Elm Green Lane - Danbury Neighbourhood Plan - Regulation 16 Representations.pdf \(1\)](#)

If you wish to submit any supporting information, please upload it here

[Appendix 1 - Extent of Site Ownership.pdf](#)

If you wish to submit any supporting information, please upload it here

[Appendix 2 - 0465-Sk001C Proposed Site Layout.pdf](#)

If you wish to submit any supporting information, please upload it here

[Appendix 3 - 23.03.15 - Elm Green Lane - Danbury Neighbourhood Plan - Regulations 14 Representatio.pdf](#)

Planning Policy Team
Spatial Planning Services
Chelmsford City Council
Civic Centre
Duke Street
Chelmsford
CM1 1JE

18th June 2024

Lanpro Project Number: 1994/P

By email (policy@chelmsford.gov.uk)

Dear Sir / Madam,

Danbury Neighbourhood Plan 2023 – 2036: Regulation 16 Consultation, Representations on behalf of Landvest Developments Limited

Lanpro Services Limited ('Lanpro' hereafter) act as planning consultants to Landvest Developments Limited ('Landvest' hereafter) in respect of their land interest to the north of Elm Green Lane, Danbury, Essex, CM3 4DR ('the Site' hereafter) – a Site Location Plan is included at Appendix 1. Landvest has instructed Lanpro to submit representations to the Danbury Neighbourhood Plan 2023 – 2036: Regulation 16 Consultation Version ('Neighbourhood Plan' or 'NP' hereafter).

Previous Representations

A Representation was submitted in March 2022 on behalf of Landvest to the Pre-Submission (Regulation 14) Consultation Version. The representation provided background details of Landvest; described the Site and its Planning Context; outlined discussions that had been undertaken with Danbury Parish Council, Chelmsford City Council, and Essex County Council as the Highway Authority; summarised the proposed development; commented on the evidence base documents which supported the emerging Neighbourhood Plan; and set out representations to specific paragraphs and draft policies of the Neighbourhood Plan. A copy of the representations made to the Pre-Submission Consultation Version is included in Appendix 3.

Landvest wishes to draw the City Council's attention to the following matters that are identified in the representations:

- **Paragraph 5.4 of the Neighbourhood Plan:** The ecological benefits of the proposed development should be weighed in favour of the allocation of the Site.
- **Draft Policy DNP1: Housing Site Allocations:** It is considered that the 100 dwelling figure should be treated as a minimum and that more sites should therefore be allocated.

- **DNP21 (now DNP17) Rural and Protected Lanes:** It there is no justification for classifying Elm Green Lane as a rural and protected lane.

This submission highlighted the deliverability of the Site and objected to Policy DNP1 because the Site should be included as a proposed allocation for approximately 6no dwellings. Additionally, Landvest noted the criteria in Paragraph 5.4 of the Neighbourhood Plan against which sites were assessed to determine their appropriateness to be proposed for allocation. It was argued that great weight should be afforded to proposals which enhance SSSIs. As previously noted in the Regulation 14 submission, the Proposed Development includes a biodiversity rich amenity resource for the local community, which should be considered when allocating the Site.

The submission also objected to Draft Policy DNP21 (now DNP17), which restricts development on rural and protected lanes. The evidence base documents and previous engagement with the Highways Authority concluded that there is no justification for classifying Elm Green Lane as a rural lane. As a result, Landvest objected to this allocation. A copy of the submission made to the previous consultation version of the emerging Local Plan is provided at Appendix 3 to this letter.

Comments to the Regulation 16 Consultation Document

The Regulation 16 Neighbourhood Plan policies that were previously commented against haven't changed from the previous draft (Regulation 14). Landvest therefore considers that its representation remains relevant, and requests that these are considered as part of Regulation 16. To reiterate, the concerns primarily relate to insufficient housing allocations being identified within the Neighbourhood Plan (Policy DNP1); that the Site has not been allocated for development despite the clear benefits that would be created, together with the lack of harm from a heritage and transport and highways perspective; and the designation of Elm Green Lane as a protected lane (Policy DNP17). As detailed in the previous submission, the Site remains suitable for development and is a logical extension of the existing settlement. As noted, the scheme would also include sufficient mitigation to ensure that visual and material impacts are not significant and therefore would be an appropriate location for a housing development.

As detailed in the previous submission, the Neighbourhood Plan is found to be inconsistent with the basic conditions set out in the T&CPA. Specifically, the Neighbourhood Plan will not be consistent with national policies, or in general conformity with the strategic policies contained in the development plan. Landvest therefore requests that the Site is proposed to be allocated for approximately 6 dwellings.

We trust that this response is helpful in the context of the emerging Neighbourhood Plan. We would be grateful for confirmation that the response has been received, and that the comments have been duly made. We wish to be kept updated regarding consideration of the representations, and the progress of the Neighbourhood Plan more generally.



8 Devonshire Square,
London, EC2M 4YJ

T: 020 3011 0820
E: info@lanproservices.co.uk
www.lanproservices.co.uk

Yours Sincerely

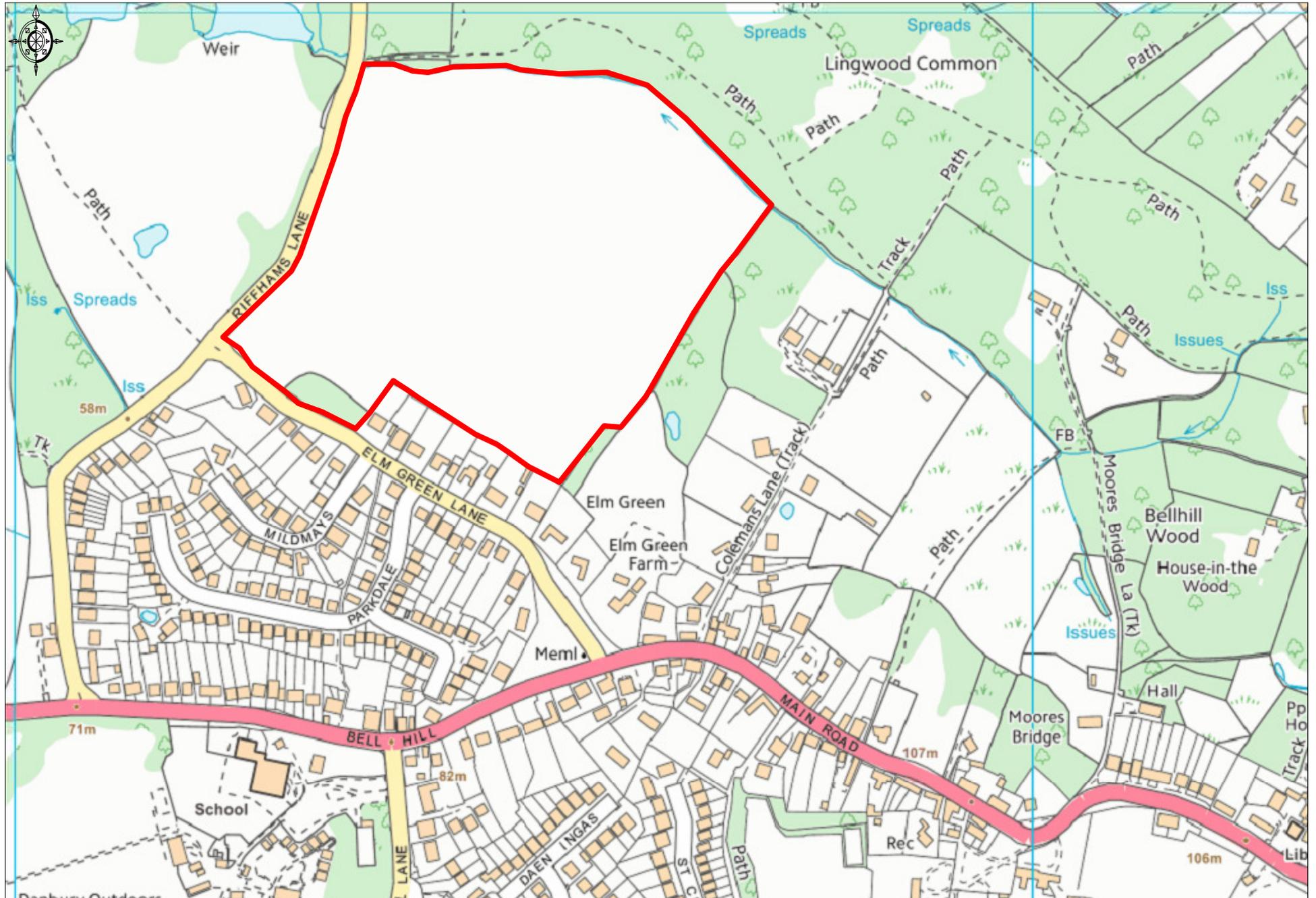
Tom Pike

Director of Planning

Enc. Site Location Plan; Proposed Site Layout; and Regulation 14 Representation;

Appendix 1 Site Location Plan

Land to the east of Riffhams Lane and north of Elm Green Lane



Ordnance Survey © Crown Copyright 2018. All rights reserved. Licence number 100022432. Plotted Scale - 1:5000

Appendix 2 Proposed Site Layout



Scheme Summary

Site Area 1.259 ha

Total plots 6

Housing Mix:

- Plot 1 = 5 bed house (2,550ft²)
- Plot 2 = 5 bed house (3,375ft²)
- Plot 3 = 5 bed house (3,400ft²)
- Plot 4 = 5 bed house (2,450ft²)
- Plot 5 = 5 bed house (3,650ft²)
- Plot 6 = 6 bed house (4,475ft²)

Rev.	Date	Details	Drawn	Checked
Issued for:				
DRAFT				
Project/Client:		Project No:		
Land off Green Elm Lane		0465		
Danbury		Dwg No:	Rev:	
Essex		Sk001	C	
(Landvest)		Scale:		
		1:500 @ A2		
Drawing:		North:		
		○		
Proposed Site Layout		Drawn By:	Date:	
		PJA	02/2021	
		Checked By:	Date:	
		PJA	02/2021	

DRAFT

Project/Client: Land off Green Elm Lane

Danbury Essex (Landvest)

Project No: 0465

Dwg No: Sk001 Rev: C

Scale: 1:500 @ A2

Drawing: North: ○

Proposed Site Layout

Drawn By: PJA Date: 02/2021

Checked By: PJA Date: 02/2021



Appendix 3 Regulation 14 Representation

Danbury Neighbourhood Plan Steering Group,
Danbury Parish Council,
The Old School House,
Main Road,
Danbury,
Chelmsford,
Essex,
CM3 4NQ.

15th March 2022

Lanpro Project Number: 1994/P

By Email (parish.council@danbury-essex.gov.uk) and Online Response Form

Dear Sir / Madam,

Danbury Neighbourhood Plan 2023 – 2036: Pre-Submission (Regulation 14) Consultation Version

Representations on behalf of Landvest Developments Limited

Lanpro Services Limited ('Lanpro' hereafter) act as planning consultants to Landvest Developments Limited ('Landvest' hereafter) in respect of their land interest to the north of Elm Green Lane, Danbury, Essex, CM3 4DR ('the Site' hereafter) – a Site Location Plan is included at Appendix A. Landvest has instructed Lanpro to submit representations to the Danbury Neighbourhood Plan 2023 – 2036: Pre-Submission (Regulation 14) consultation Version ('Neighbourhood Plan' or 'NP' hereafter) and its associated evidence base.

Landvest Developments Limited

Landvest are an independent residential and mixed-use property development business. Landvest specialise in acquiring land and securing planning permission for residential and mixed-use development, and offers a dynamic, innovative approach. Their focus is on opportunities in Essex, Buckinghamshire, Hertfordshire, and North London, and they have successfully worked in partnership with Local Planning Authorities, Parish Councils, and local residents to deliver a number of enviable developments. Landvest currently have over 1,000 dwellings, either in the planning system or under their control legally. They have strong relationships with a number of housebuilders, including Barratt Homes, CALA Homes, Linden and Banner Homes. Their website can be viewed using the following URL: <https://landvest.co.uk/>.

Site Location and Planning Context

The Site extends to in excess of 13-hectares (32-acres), although only a small proportion is proposed to be developed (refer to 'Proposed Development' Section). It is currently an agricultural field, and therefore is undeveloped. It is sustainably located in transport terms and is circa 200-metres from the nearest bus stop. It is broadly bounded by:

- Existing properties which front onto Elm Green Lane to the south;
- Riffhams Lane, a Protected Lane, to the west. Beyond is Riffhams Registered Park and Garden of Special Historic Interest, which is Grade II Listed;
- Lingwood Common, a Site of Special Scientific Interest ('SSSI' hereafter), to the north; and
- Existing trees to the east, with a number of residential properties beyond.

On the Proposals Map which accompanies Chelmsford City Council's ('the City Council' hereafter) adopted planning policies (May 2020), the Site is located outside of, although adjacent to, the Defined Settlement Boundary of Danbury. It is not the subject of any specific allocations or designations (i.e. it is 'white land'). It is located in Flood Zone 1. A cluster of trees at the Site's southern boundary with Elm Green Lane are protected by a Tree Preservation Order.

Background

Danbury Parish Council

Landvest has been engaging with the Parish Council for a number of years in relation to the emerging Neighbourhood Plan, and specifically the proposed development of the Site. It wrote to the Sites Working Group on a number of occasions, including in December 2020 and January 2021; has virtually met with Members of the Neighbourhood Plan Steering Group on a number of occasions; and has attended a number of Parish Council Committee Meetings. The Parish Council has previously raised concern with the proposed development of the Site on the grounds of access and related transport matters; possible impacts on heritage assets in close proximity; and the presence of trees along the frontage of the Site with Elm Green Lane. Implications associated with the Lingwood Common SSSI have also been mentioned. Whilst the challenges associated with the Site's development are recognised, including its proximity to heritage assets and trees protected by a preservation order, these matters are considered to be surmountable in the context of a modest quantum of development in the southern part of the Site. This is reflected in the comments provided by the City Council and Essex County Council as the Highways Authority as part of Pre-Application Discussions – see below.

Chelmsford City Council

A meeting took place with the City Council in March 2021, with written advice provided in April 2021. The City Council raised no objection to the principle of the development of the Site from a heritage perspective. Specifically, the written advice states:

"...Overall there is no objection in principle to the development of the site from a heritage perspective..." and "...the retention of the landscape buffer and the modest scale on the eastern boundary would mitigate the impact on the setting of the Conservation Area... (Page 2)."

A number of comments were made in relation to the proposed layout and design approach in general terms. Landvest consider that the vast majority of the observations can be positively responded to, and intends to further engage with the City Council.

Essex County Council as Highways Authority

On behalf of Landvest, Ardent submitted a request for pre-application advice to Essex County Council as Highways Authority in March 2021. A pre-application meeting took place with Essex County Council on 8th April 2021. The subsequent email summary of the discussions provided by the Highway Authority confirms that a small number of dwellings, in the order of 5 / 6, is acceptable. It specifically states:

"...The advice is that a small number of dwellings, in the order of 5 / 6 may be acceptable as frontage development to reflect the houses on the opposite side of the road. This is the preferred option for development of this site from a highways perspective, however it is understood that there may be environmental reasons why this is not possible. A private drive can accommodate up to this quantum of development therefore should an access be agreed, rather than frontage development, it would have to take the form of a private drive serving up to these dwellings only..."

A number of other comments were also made in relation to connectivity for travel by sustainable modes.

Proposed Development

As previously noted, the Site extends to in excess of 13-hectares. However, it is not proposed for the majority to be developed. Rather, it is considered appropriate to provide a relatively modest number of new homes in the southern portion of the Site, essentially as an extension to the existing built frontage along Elm Green Lane. This approach could assist the City and Parish Councils in meeting their obligations, including those set out in Strategic Growth Site Policy 13 of the Local Plan, and will also enable the remainder of the Site to be turned into a biodiversity rich amenity resource for the local community, potentially removing some recreational pressure from the more sensitive landscape environments in close proximity. Detailed proposals for the amenity resource are not available at this point, although it is envisaged that it could become a local park or resource for dog walkers. Furthermore, it is proposed that the ongoing management costs of this amenity resource is borne by the occupiers of the new homes by way of an estate charge, and therefore no costs will fall to either the Parish Council or the public purse more generally.

A Proposed Site Layout is appended to these representations. This represents one way that the Site could come forward. It is not intended to be a detailed proposal given the preparatory stage of the Neighbourhood Plan. The Proposed Site Layout includes 6no dwellings. Whilst larger properties are shown, this is purely to determine the capacity of the Site, and it is eminently possible for a greater range of sizes to be provided should it be considered appropriate, including in response to the findings of the 'Danbury Neighbourhood Plan Housing Needs Assessment ('HNA' hereafter) (Evidence Base Document 20)'. It should however be noted that the HNA explicitly states that the supply of larger homes should not be inhibited altogether.

Illustrative landscaping within the development, which includes additional planting at the margins, is also included on the Proposed Site Layout to assist understanding of the type of development proposed. This would ensure that the development is appropriately screened from the built heritage sensitivities to the east and west; and existing homes to the east and south.

The new homes would be served from a single access point, with the main road separating into a small number of secondary routes to serve each individual plot. The existing field access is to be retained as a pedestrian and footpath link. The new vehicular access has been positioned to ensure that the existing trees which are the subject of a Tree Preservation Order are retained, as well as the majority of those which are mature and of sufficient quality to merit retention.

The Site is also considered to be 'deliverable' in the context of the 'tests' established by national planning policy. Namely:

- The Site is in a single ownership and Landvest are contractually obligated to purchase the land;
- It offers a suitable location for residential development in that it is immediately adjacent to the Defined Settlement Boundary for Danbury, and therefore is sustainably located in transport terms;
- Subject to the allocation of the Site in the Neighbourhood Plan, there is a clear prospect that housing will be delivered within the next five-years; and
- The residential-led development of the Site is financially viable having regard to the 'tests' of planning obligations set out in national planning policy and the Community Infrastructure Levy regulations.

Comments to the Evidence Base Documents that support the Pre-Submission Consultation Version of the Neighbourhood Plan

Overarching Comment

Landvest welcomes that the emerging Neighbourhood Plan is supported by a number of evidence base documents. It considers that all policies and allocations included within the Neighbourhood Plan should be underpinned by relevant and up-to-date evidence, which should be adequate and proportionate. Landvest considers that this approach will ensure that the Neighbourhood Plan is consistent with national policy, and the basic conditions set out in Schedule 4B of the Town and Country Planning Act 1990 (as amended) ('T&CPA' hereafter). However, Landvest has a number of concerns related to some of the evidence base documents. Furthermore, the findings of some of the evidence base documents specifically related to the Site are not consistent. These concerns are summarised below.

Supporting Evidence Base Documents 5A (Site Options and Assessment Report – April 2019); 5B (Appendix A – Individual Site Pro-Forms – May 2019); and 5C (Site Options and Assessment Report – March 2020)

Landvest notes the findings of the Evidence Base Documents 5A, 5B and 5C. The assessments included within these Evidence Base Documents relate to earlier iterations of the Proposed Development, and therefore Landvest considers that its findings are out-of-date and should be afforded reduced weight.

Supporting Evidence Base Document 5D – Site Options and Assessment Report (November 2021)

Landvest welcomes and supports that the Site is considered '*suitable or potentially suitable for allocation in the Neighbourhood Plan*' in the latest iteration of the Site Options and Assessment Report (November 2021). It also supports the recognition that the Site is '*potentially suitable for development of approximately 5 homes*'.

Notwithstanding the above, Landvest wishes to draw attention to the Site Assessment conclusions identified on Page 43 of the document. Specifically, the findings of the City Council's 2021 'SHELAA' relate to the development of the entire Site, and therefore assume a potential yield of 343 dwellings. The assessment is therefore not based on the latest iteration of the Proposed Development, which is for a much smaller proposal comprising 5 or 6 dwellings. Landvest therefore considers that reduced 'weight' should be afforded to this part of the conclusions, and considers that the Proposed Development will likely be attributed a score of 1 in the forthcoming iteration of the City Council's 'SHELAA'.

Supporting Evidence Base Document 15 – Essex County Council Highways Access Technical Note (August 2021)

Landvest welcomes the recognition in the Technical Note that the Proposed Development of the Site is 'suitable' on the grounds of transport and highways considerations. This is consistent with the view provided by the Highways Authority during pre-application discussions. It is noted that other evidence base documents, specifically the Strategic Environmental Assessment and document titled 'Impact on Local Highways Network', make the contrary conclusion. As set out in due course, it is considered that these evidence base documents should be afforded reduced weight.

Supporting Evidence Base Document 21 – Strategic Environmental Assessment for the Danbury Neighbourhood Plan (July 2022)

Landvest requests that the assessment for the Site included within the Strategic Environmental Assessment ('SEA' hereafter) for the Neighbourhood Plan is updated to reflect the latest iteration of the Proposed Development, together with more recently available information. The SEA states that schemes of 300no, 100 and 30no dwellings have been assessed in respect of the Site. As previously noted, the latest iteration of the Proposed Development comprises 5 or 6 dwellings. Furthermore, it is clear that the colours attributed to the technical matters in Table 6.5 relate to a 'worst case' assessment (i.e. a development of 300no dwellings) and therefore provide a disproportionate and unreasonable conclusion. Specifically:

- Air Quality. The assessment accepts that a development under the low growth scenario of 30no dwellings is '*considered likely to have minimal effects*'. However, a '*significant negative*' effect has been attributed to the proposed development of the Site. Given that the latest iteration of the Proposed Development is significantly below the lowest scenario, it is considered appropriate for the conclusions of the SEA to be updated.
- Biodiversity. The assessment accepts that '*minor positive effects*' could result from development of the smaller Site. However, a '*minor negative*' effect has been attributed to the proposed development. Notwithstanding this, Landvest consider that a minor positive effect underplays the benefits associated with the remainder of the Site being turned into a biodiversity rich amenity resource for the local community, removing some recreational pressure from the more sensitive landscape environments in close proximity. It therefore considers that '*significant positive*' should be attributed to the proposed development in relation to this matter.
- Climate Change (Mitigation and Adaptation). Landvest welcomes the recognition that the Site has '*relatively good accessibility to the existing bus services supporting access to more sustainable transport modes, as well as day-to-day services and facility needs supporting a reduced need to travel*'. For the reasons set out in this representation, and specifically the position agreed with the Highway Authority, Landvest disagree that the Proposed Development would result in negative effects on the local road network. It therefore considers that a '*neutral effect*', as a minimum, should be attributed to the proposed development in relation to this matter and requests that the SEA is accordingly updated.
- Landscape. The effect of the Proposed Development is stated in the SEA to be '*significant negative*'. However, it recognises that the growth of around 30 dwellings on a smaller parcel of land in the southwest corner of the Site would likely have more limited potential negative effects on landscape setting and character. Given that the latest iteration of the Proposed Development includes 5 or 6 dwellings, which could be largely screened by additional boundary planting, together with the remainder of the Site being turned into a biodiversity rich amenity resource for the local community, it is considered that the effects should be '*neutral*', and Landvest requests that the SEA is accordingly updated.
- Historic Environment. Landvest welcomes the acknowledgement that a more limited development could potentially be designed such that direct sight lines between the Site and Registered Park and Garden are screened to avoid an urbanising effect. Landvest also accepts that the precise nature of the effects can only be determined once the quantum of development, design and layout is fixed. Notwithstanding this, Landvest considers that the development of the Site for the number of dwellings envisaged will likely result in a '*neutral*' effect to the significance of the heritage assets in close proximity. This reflects more recent discussions undertaken with the City Council as part of pre-application discussions.
- Transportation. Based on the advice provided by the Highways Authority, and findings of the Highways Access Technical Note, it is considered that the SEA conclusion of '*significant negative*' should be significantly reduced. It is therefore contended that the SEA provides an inflated assessment of the likely effects of the Proposed Development in relation to transport and highway matters.

The SEA identifies in Paragraph 7.1 that the Site was rejected on the basis of highways evidence limiting development to a maximum of 5no dwellings, and concerns regarding the potential impact on nearby heritage assets. Paragraph 7.1 continues to state that the 'schemes to date' indicate a small development of large homes which are less likely to serve local housing needs. Whilst larger properties are shown, it is

eminently possible for a greater range of sizes to be provided, and therefore it is not considered that this is an appropriate reason to reject the Site. Furthermore, the Parish Council's own evidence base explicitly state that larger homes should not be inhibited. As noted above, the impacts of the Proposed Development are much reduced when compared to those stated in the SEA. Its rejection is therefore considered to be unjustified on the basis of the SEA, principally as the Proposed Development will clearly contribute to the achievement of Sustainable Development (Basic Condition D as set out in the T&CPA).

Supporting Evidence Base Document 23A – Chelmsford Local Plan Heritage Assessment Technical Note (March 2017) and Addendum 2 for Danbury (April 2019)

Supporting Evidence Base Document 23B – Chelmsford City Council Heritage and Conservation Officer Advice (March 2020)

Paragraph 2.8 of the Technical Note relates to the Site. It states that the Site forms part of the rural context to the Riffhams Registered Park and Garden. To mitigate the impact on the Registered Park and Garden, the Technical Note considers that a planting belt of minimum 50m width along the Riffhams boundary is required, together with a limitation of building heights to 2-storeys and vernacular built forms with a low-density edge to Riffhams Lane, and southern edge of the Conservation Area.

Landvest recognises that the Site sits between two designated heritage assets: the Danbury Conservation Area to the south-east of the Site; with Riffhams Park, a Grade II registered Park and Garden focused on a Grade II Listed Building (also known as Riffhams), to the west. However, it is not considered that the proximity of the heritage assets would preclude the development of part of the Site. Riffhams Park is separated from the Site by Riffhams Lane, with the Conservation Area disconnected by dense planting and existing late 20th Century housing.

Landvest acknowledge that the development of the Site has the potential to affect the setting and significance of Riffhams Park through altering its rural setting and view from the Park. However, it is considered that the need to provide a planting belt with a minimum of 50 metres width is arbitrary and without basis. Riffhams was constructed in 1815-1817 by John Robert Spencer Phillips as a replacement for an earlier grand house that Spencer Phillips inherited in 1809. The new house was built as a grand, neo-Classical dwelling. Humphry Repton, the renowned landscape designer, was commissioned to advise on the design and layout of the grounds. The park is focused principally to the south of the house and includes expansive areas of parkland, with 2 large ponds and a mixture of tree belts and isolated trees. The land within the immediate vicinity of the house is more formally arranged. The land to the south was used as pasture and bound by dense shelter belts.

The setting of the registered park was historically rural. However, the development of Danbury, which has gradually spread to the west during the 20th century, has reduced the extent of this wider rural land. It is acknowledged that the Site forms part of the surviving rural setting of the park, but there is little appreciation of the Park from within the Site given the extent of intervening planting. The experience of the Park from within the Site is therefore largely limited to this boundary planting, which provides a physical and visual barrier, and which would be maintained and enhanced as part of the Site's development. The contribution made by the Site to Riffhams Park's significance is consequently limited. Whilst the Site

provides some rural context, it is considered that this is weakened to the south, especially where the Site adjoins existing 20th Century residential development, both to the north and south of Elm Green Lane. The southern part of the Site therefore makes a limited contribution to the significance of Riffhams park and is considered to be of low sensitivity. It is principally for this reason that a modest enclaved development is proposed in the southern part of the Site, with the balance to be turned into a biodiversity rich amenity resource for the local community. This approach will limit any impacts on the park, with the provision of additional landscaping and planting along the Site's margins further helping to reduce the visual impact of a development and retaining enclosure and rural context of the Park.

It is considered unlikely that a development of the scale envisaged will alter the significance of the Conservation Area. The Conservation Area has not been identified by the Conservation Officer as a constraint and is separated from the Site by intervening development and planting. This part of the Conservation Area's setting is characterised by later development, which has reduced its association with the wider rural land. It is therefore considered that the development of the Site would not harm the significance of the Conservation Area, and therefore would be acceptable in policy terms.

So whilst the Site is located between two designated heritage assets and forms part of the semi-rural setting of Riffhams Park, it is considered possible to develop the southern portion of the Site whilst conserving the significance of the surrounding heritage assets. This will be achieved through the siting of development, limiting building heights to a maximum of 2-storeys, and careful design measures, including managed landscaping. In this context, it is considered that the proposed development of the site would be acceptable in planning policy.

Landvest therefore consider that the contents of the Technical Note related to the Site should be discounted. This contention aligns with the direction provided by the City Council as part of the Pre-Application Response.

Supporting Evidence Base Document 24 – Site Selection and Allocation Report (March 2022)

The Site Selection and Allocation Report states that the Site has not been proposed to be allocated for development due to it being accessed from a 'Local Road'. The only difference between the Site's performance against the selection criteria, and that of Sites D7 (Land at Tyndales Farm West) and D14 (Danecroft, Woodhill Road), is the 'impact on the local highway network'. This is despite the Highways Authority acknowledging that a development of 5 or 6 dwellings is acceptable in transport and highways terms. Landvest therefore queries the appropriateness of the criteria used in the Site Selection and Allocation Report, especially as residents have identified a clear preference for smaller developments of 10 or fewer dwellings. Despite this, a development of approximately 65 dwellings is proposed to be allocated. Furthermore, the number of dwellings proposed to be allocated in the Neighbourhood Plan falls short of the figure stated in Strategic Growth Site Policy 13, and Landvest contends that the figure should be a minimum, not a maximum, requirement, and should not be treated as a tool to refuse planning permission on sustainable sites that would otherwise help to boost the supply of housing in accordance with the Government's objective in Paragraph 60 of the National Planning Policy Framework ('NPPF' hereafter) (July 2021). This is considered in further detail in the subsequent section.

Supporting Evidence Base Document 26 – Impact on Local Highways Network (March 2022)

Landvest considers that the document titled 'Impact on Local Highway Network' should be discounted on the basis that its views are not consistent with that of the Highways Authority, or Evidence Base Document 15 – Essex County Council Highways Access Technical Note (August 2021). Specifically, the Highways Authority is clear that a development of 5 or 6 dwellings is acceptable in transport and highways terms. Elm Green Lane being impassable after snow is purely conjecture and not based on any evidence which supports the Neighbourhood Plan. Landvest does not consider it appropriate for the document to be used in the site-selection process, principally as it is not based on robust evidence.

Representations to the Pre-Submission Consultation Version of the Neighbourhood Plan

Overarching Comment

Landvest supports the principle of the Neighbourhood Plan. It recognises the significant efforts that it takes to prepare a Neighbourhood Plan, specifically from the Parish Council, local residents and other interested stakeholders. It therefore intends to reiterate its 'in-principle' support at the Regulation 16 stage, and is willing to assist the Parish Council if welcomed. However, Landvest objects to a number of specific matters as included in the Neighbourhood Plan. This includes, inter alia, the site-selection process, a number of evidence base documents, the proposed housing site allocations, and the omission of the Site from the proposed housing allocations. Detailed comments are provided below.

Paragraph 5.4

Landvest notes the criteria in Paragraph 5.4 of the Neighbourhood Plan against which sites were assessed to determine their appropriateness to be proposed to be allocated. Landvest does not wish to comment in detail in relation to the criteria. Although, it considers that great weight should be afforded to proposals which enhance, not those that do not cause harm to SSSIs. As previously noted, the Proposed Development includes a biodiversity rich amenity resource for the local community. This part of the Proposed Development may potentially remove some recreational pressure from the more sensitive landscape environments, specifically the SSSIs, in close proximity. Landvest therefore considers that this element of the proposed development should be weighed in favour of the allocation of the Site. It does not appear from the Evidence Base Documents which support the Neighbourhood Plan that this element of the Proposed Development has been considered.

Draft Policy DNP1: Housing Site Allocations

Landvest objects to Policy DNP1 as currently drafted. Specifically, Landvest considers that the Site should be included within Policy DNP1 as a proposed allocation for approximately 6no dwellings. Landvest considers that failure to do so will result in the Neighbourhood Plan being found to not meet the basic conditions as set out in the T&CPA.

Danbury is a Key Service Settlement located outside of the Green Belt with a good range of local services and facilities. Danbury is therefore a sustainable settlement, which is reflected in Strategic Growth Site Policy 13 requiring an allocation of “*around 100 new homes to be accommodated within or adjoining the Defined Settlement Boundary.*” As stated in Paragraph 7.360 of the Local Plan, the number of dwellings required to be allocated by Policy 13 represents approximately a 5% increase in the number of homes within Danbury. Landvest consider this to be a very minor increase, and see no reason why the number of dwellings stated in Policy 13 should not be treated as a minimum (as opposed to a target).

The Neighbourhood Plan as currently drafted only seeks to allocate approximately 93no dwellings. Whilst it is recognised that the balance of the requirement may come forward as windfall development on smaller sites, as stated in the second part of Draft Policy DNP1, Landvest queries why additional allocations cannot be identified to ensure greater consistency with the requirements of Policy 13. Whilst the Neighbourhood Plan does not appear to include a definition of ‘*smaller sites*’, a threshold of less than 10 dwellings was used in the Residents’ Questionnaire (Evidence Base Document 11). Given that the Proposed Development comprises 5 or 6 dwellings, it constitutes a ‘smaller site’, and therefore its proposed allocation would be entirely consistent with the preferred option identified by residents (Paragraph 5.6 of the Neighbourhood Plan).

In addition to the above, the NPPF is clear at Paragraph 74 that housing land supply targets should be considered a minimum, not a maximum, requirement, and should not be treated as a tool to refuse planning permission on sustainable sites that would otherwise help to boost the supply of housing in accordance with the Government’s objective in NPPF Paragraph 60. Whilst it is accepted that this direction in the NPPF relates to five year housing land supply, Landvest contends that the same principle should be afforded to Policy 13 and the Neighbourhood Plan. Landvest considers that failure to do so could render the Neighbourhood Plan inconsistent with national policy, and the basic conditions set out in the T&CPA.

Landvest notes from the City Council’s latest development trajectory that 50no dwellings are anticipated to be delivered within the Danbury Neighbourhood Plan Area within the period 2025/26 to 2029/30. Given that the Danbury Neighbourhood Plan Area was originally designated in March 2016, that it has taken approximately 7-years to reach the Regulation 14 stage, that it still needs to progress through the Examination and Referendum stages, and that planning permission will also need to be granted before dwellings are delivered, Landvest considers it prudent for additional allocations to be identified to maximise the prospects of Policy 13 being achieved.

The Evidence Base which supports the Neighbourhood Plan clearly demonstrates that the delivery of the Site is appropriate. Specifically, Supporting Evidence Base Document 5D – Site Options and Assessment Report (November 2021) states that the Site is ‘*suitable or potentially suitable for allocation in the Neighbourhood Plan*’ and explicitly states that the Site is ‘*potentially suitable for development of approximately 5 homes*’. This reflects the views of Essex County Council as the Highways Authority who have accepted that the development of the Site comprising 5 or 6 dwellings is appropriate. Such a development would not detrimentally impact on the heritage assets in close proximity, specifically the Conservation Area to the east or the Registered Park or Garden to the west. Furthermore, there is no other

technical constraint which would preclude the development of the Site for the number of homes envisaged, including the presence of trees protected by a preservation order to the south.

As identified in the preceding section, the Evidence Base which supports the Neighbourhood Plan is not consistent in terms of its assessment of the Site's Proposed Development, and parts should be largely discounted. This includes, inter alia, the SEA providing a disproportionate and unreasonable conclusion in relation to the Site; the Heritage Assessment Technical Note and Addendum for Danbury; and Impact on Local Highways Network. Landvest considers that failure to omit these documents from the Evidence Base may result in the Neighbourhood Plan being found to be inconsistent with the basic conditions set out in the T&CPA.

It is considered that the Site provides an opportunity to deliver real benefits to the community, specifically the biodiversity rich amenity resource which may potentially remove some recreational pressure from the more sensitive landscape environments in close proximity. It will also assist the City and Parish Councils with meeting the requirements of Strategic Growth Site Policy 13. A development of 6-dwellings in the southern part of the Site will not impact upon the heritage assets in close proximity or the trees protected by a preservation order. It will also be appropriate in transport and highways terms, and the Site is considered to be 'deliverable' in the context of the 'tests' established by national planning policy.

Landvest considers that the failure to propose to allocate the Site for development clearly undermines the robustness of the evidence base which is intended to support Neighbourhood Plan. Furthermore, it may result in the Neighbourhood Plan being found to be inconsistent with the basic conditions set out in the T&CPA. Specifically, the Neighbourhood Plan will not be consistent with national policies, or in general conformity with the strategic policies contained in the development plan. Landvest therefore requests that the Site is proposed to be allocated for approximately 6 dwellings in subsequent iterations of the Neighbourhood Plan.

Draft Policy DNP21: Rural and Protected Lanes

Figure 9 of the Neighbourhood Plan identifies Elm Green Lane, and Riffhams Lane southwards from Elm Green Lane as 'Rural Lanes'. Draft Policy DNP21 states that development proposals which affect protected and non-designated local lanes, which is assumed to include 'Rural Lanes', will not be supported if it would give rise to intensification of traffic. Landvest objects to this on the basis that there is currently no evidence which supports the identification of Elm Green Lane as a protected or non-designated local lane. To the contrary, Evidence Base Document 18B discounted Elm Green Lane from full assessment on the basis that it did not meet the required threshold for integrity and diversity. Even if it had reached the threshold for protected status, intensification of use of Elm Green Lane does not automatically result in additional harm. Given that the Highways Authority has accepted that the development of the Site for 5 or 6 dwellings is appropriate in transport and highways terms, it is considered that there is no justification for seeking to protect Elm Green Lane as a Rural Lane. Landvest therefore requests that Elm Green Lane is not identified as a Rural Lane in subsequent iterations of the Neighbourhood Plan.



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We trust that this response is helpful in the context of the emerging Neighbourhood Plan. We would be grateful for confirmation that the response has been received, and that the comments have been duly made. We wish to be kept updated regarding consideration of the representations, and the progress of the Neighbourhood Plan more generally.

Yours Sincerely

Tom Pike

Director of Planning

Enc. Site Location Plan; and Proposed Site Layout.



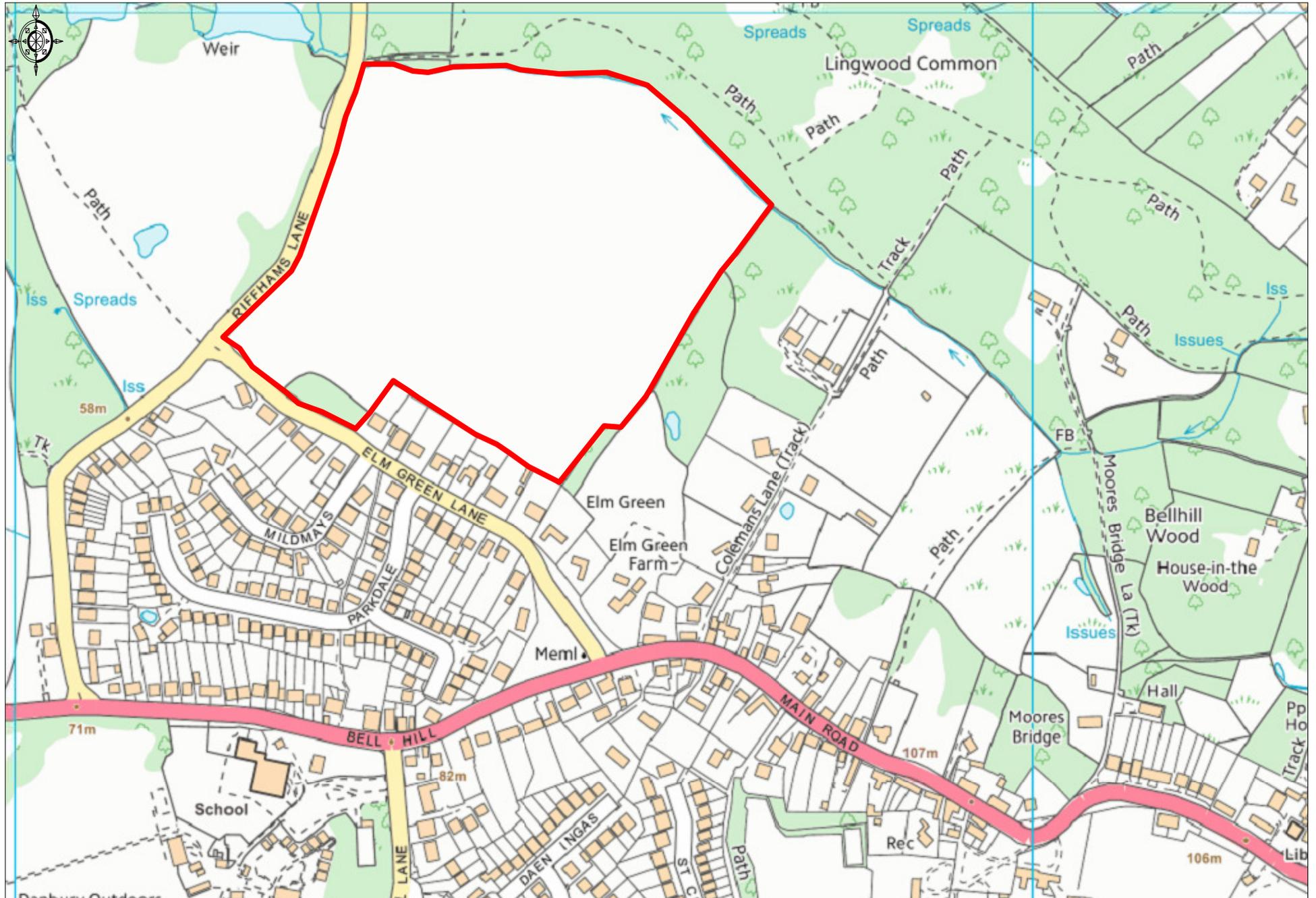
8 Devonshire Square,
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Appendix 1

Site Location Plan

Land to the east of Riffhams Lane and north of Elm Green Lane



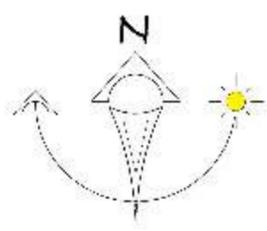
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Appendix 2 Proposed Site Layout



Scheme Summary

Site Area 1.259 ha

Total plots 6

Housing Mix:

- Plot 1 = 5 bed house (2,550ft²)
- Plot 2 = 5 bed house (3,375ft²)
- Plot 3 = 5 bed house (3,400ft²)
- Plot 4 = 5 bed house (2,450ft²)
- Plot 5 = 5 bed house (3,650ft²)
- Plot 6 = 6 bed house (4,475ft²)

Rev.	Date	Details	Drawn	Checked
Issued for:				
DRAFT				
Project/Client:		Project No:		
Land off Green Elm Lane		0465		
Danbury		Dwg No:	Rev:	
Essex		Sk001	C	
(Landvest)		Scale:		
		1:500 @ A2		
Drawing:		North:		
		○		
Proposed Site Layout		Drawn By:	Date:	
		PJA	02/2021	
		Checked By:	Date:	
		PJA	02/2021	



Comment

Consultee	Ms Michelle Harper (1097102)
Email Address	parish.council@danbury-essex.gov.uk
Company / Organisation	Danbury Parish Council
Address	Parish Office The Old Schoolhouse Danbury CM3 4NQ
Event Name	5. Danbury Neighbourhood Plan Reg 16 Consultation
Comment by	Danbury Parish Council (Ms Michelle Harper - 1097102)
Comment ID	DNP-93
Response Date	18/06/24 15:10
Status	Processed
Submission Type	Web
Version	0.1

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Whole plan

Question 2

Please add your comments below

Our Neighbourhood Plan Group have worked very hard in the preparation of the Plan providing clear and concise communication at all important stages throughout the process and the Council strongly recommends its approval.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mr Ryan Hartles (1359883)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mr Ryan Hartles (1359883)

Comment ID DNP-94

Response Date 18/06/24 16:43

Status Processed

Submission Type Web

Version 0.3

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site B: Land at Tyndales Farm West

Question 2

Please add your comments below

I would like to formally note my objection to the Site B plan land at Tyndall Farm west, primarily on the basis of the impact this would have to:

- 1) local residents in terms of the damage this would do to their views of the countryside, huge increase in traffic which local roads cannot support, noise and pollution
- 2) local wildlife - which does not have a voice and is already at huge risk in the south east
- 3) the local economy via the knock on impacts that increased houses create to local business. Increased population inevitably causes impacts through large corporations - such as supermarkets - seeing a business opportunity as a result of increased population, which ultimately impacts local businesses

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mr Martin Jackson (1273228)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mr Martin Jackson (1273228)

Comment ID DNP-95

Response Date 18/06/24 17:37

Status Processed

Submission Type Web

Version 0.3

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site B: Land at Tyndales Farm West

Question 2

Please add your comments below

I strongly disagree with the allocation of circa 64 houses being built on the Tyndale Farm site. It is an unnecessary extension of the urban boundary when there are opportunities for in fill building and back garden development within the existing boundaries. Obviously less attractive to a developer whereas a single site is purely a financial enticement to draw developers in.

The site will remove valuable agricultural land which should be preserved as we are already unable as a country to provide all of our own food. Local grown produce has reduced food miles and has less impact on the environment.

A modern housing estate would ruin the character of the village.

Local amenities are already stretched with people struggling to get appointments with Danbury Medical Centre and local schools being over prescribed.

There is already significant traffic issues within the village with the A414 at capacity at peak times.

The addition of probably 120+ extra vehicles with multiple daily movements just adds to the problem.

If the Hammond's Farm development of 4000+ houses goes ahead there is no justification for adding 60+ houses to Danbury.

Building in this site opens it up for future spreading room into the rest of the Tyndale's Farm for unscrupulous developers which would be a disastrous for the village and immediate residents.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mrs Susan Pattinson (1359923)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mrs Susan Pattinson (1359923)

Comment ID DNP-96

Response Date 19/06/24 15:39

Status Processed

Submission Type Web

Version 0.3

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site B: Land at Tyndales Farm West (Area B on Figure 5)

Question 2

Please add your comments below

I would like to strongly object to the proposed development of this area. I have been a resident of Cherry Garden Lane since 2013, living just before the crossroads with Hyde Lane within a few metres of the site. A junction which is already extremely difficult to navigate on foot or by car.

On a personal level I would be directly and adversely affected by such development, which appears to me to be a housing estate plonked on a piece of farmland. This amazing field will lose its character unnecessarily and inappropriately. I understand the need for housing and do not oppose planning in a NIMBY sense, however, I do feel in this case it is in the wrong position, ruining the last spot of green before exiting Danbury towards Maldon. The estate in this proposal is not in keeping with the existing properties in this part of the village and we badly need this area to enjoy. I acknowledge Danbury is blessed with wonderful countryside which I also enjoy regularly, yet many areas would require me to walk my dog there by driving first if I needed to use them daily.

Richborough Estates applied to have this land approved for up to 150 houses in 2017. This was successfully opposed by residents including myself, the Hands Off Danbury group and the Parish Council supported our action I believe. I'm at a loss to why this site is now deemed suitable. Once this farmland and its associated natural beauty and wildlife is gone it can never be recaptured. I feel very strongly that once a small parcel is allowed to be developed the planning floodgates will open and yet further sections of land will be lost. Another recent planning application for housing on the plot at 116

Maldon Road was refused and the objections raised all apply here – wildlife, access problems, dangerous A414, suitability to existing housing etc.

I regularly run along the western perimeter of this field and across the footpath dissecting the field which runs through the heart of this proposal. It is a safe alternative to the roads. I walk my dog here daily. If this proposal proceeds, I would be offered a walk or run through a housing estate albeit one that is suggested will be screened. All residents of the lanes close by and visitors who also enjoy this tranquil area to walk, run, cycle and even hit golf balls will be affected. It is very much an oasis at the end of my lane. I always enjoy meeting people and sharing a sense of community in this quiet area, where it is possible to chat safely. Using Cherry Garden Lane, Hyde Lane, Mill Lane as a pedestrian is an alternative with little appeal. These 'rat runs' are already used by so many vehicles where drivers often cut through as an alternative and to gain a perceived advantage to the hugely congested and polluting A414. The traffic is often at a standstill during rush hour which makes cars and vans speed through these lanes. There has been many a time I have had to avoid dangerous traffic by jumping into ditches or residents' front gardens. There are few or no pavements on what are effectively single lane roads. This proposal would only add to the unacceptable and hazardous situation we already have.

Coupled with the yet to be seen impact of possible other developments in Danbury and the large-scale ongoing construction in Maldon this would add to the increasingly difficult to access main road from Cherry Garden Lane either end and at the Hyde Lane junction. Often cars are reversing on Cherry Garden Lane to allow cars to turn in from the A414 where the access is so narrow and of limited view. The traffic when not congested is often very much picking up speed as it heads out of Danbury at this point and entering the village from Maldon here at speeds more than the speed limit and I cannot see how the proposed new Cherry Garden Lane access would put a stop to this. It is proposed at the outline stage yet could easily be dropped at a later stage from the final plans as is so often the case. The lanes are full of potholes and have been repaired numerous times increasingly so in the last few years and these repairs are superficial and not long lasting. The roads are simply not up to the job of catering for so many vehicles and the need for constant repairs would undoubtedly be exacerbated by the extra traffic generated by construction and then more cars from this site. The proposal suggests crossing points and bus stops to accommodate the change. I think without a massive traffic reducing measure this would not work and cause many more road rage incidents at peak times when traffic comes to this point. Similarly, 'filtered views' and planting measures are promised to mitigate the impact of the housing, yet this will take many years to establish if it indeed goes ahead and is not watered down.

I have uploaded a selection of photos detailing my many walks in all weathers here over the years. I hope a magnificent panoramic video also uploads to show the beauty of the far reaching and uninterrupted views across the field. This landscape will cease to exist, and no planting scheme could compensate.

The proposal offers reasoned justification for this site stating new community facilities retaining the character of Danbury. I am rather perplexed to what these proposed facilities here consist of.

I refute that this site is a short distance to key village amenities and facilities. There are no schools nearby unless you include the private prep school. It is not a pleasant walk to the heart of the village with the traffic thundering close by. Many pavements are narrow, unsuitable for the elderly or pushchairs. I walk here and have the experience of being soaked by large lorries passing during rainy weather. Crossing the Tesco Express entrances on foot is always tricky due to its popularity. Many drivers are inconsiderate and see this stretch of road as a route from A to B with little or no regard for those on foot.

The medical centre has zero capacity for new patients, and it is widely documented how difficult accessing the system and getting appointments is already. There is very limited parking available in the village for those wishing to access the businesses here. It is very easy to state these things exist yet the reality of accessing them is another matter entirely. The proposal has little regard for existing residents here and would be a blight to our end of the village.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

**If you wish to submit any supporting information, [IMG_4497.MOV](#)
please upload it here**

**If you wish to submit any supporting information, [Screenshot 2024-06-19 153111.jpg](#)
please upload it here**



08



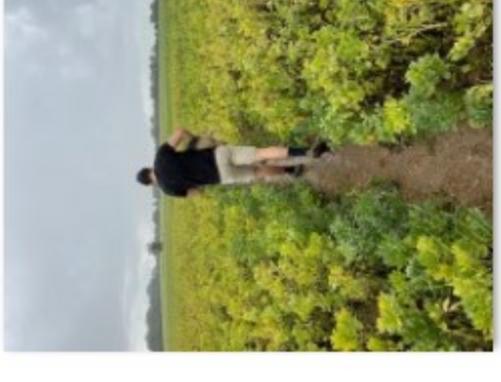
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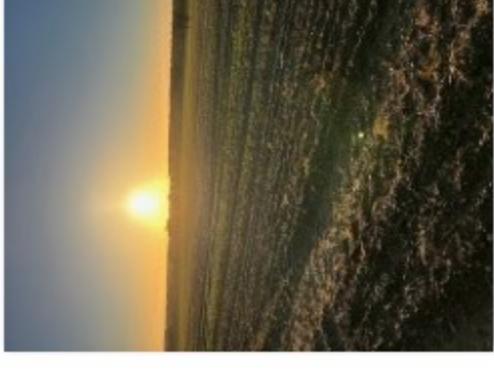
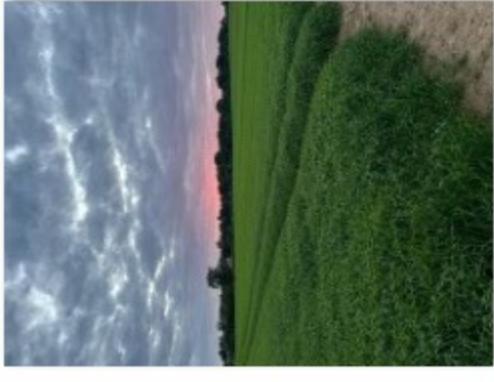
05



06



07



Comment

Consultee Mr Graeme Bennett (1359936)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mr Graeme Bennett (1359936)

Comment ID DNP-97

Response Date 18/06/24 21:27

Status Processed

Submission Type Web

Version 0.3

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site B: Land at Tyndales Farm West

Question 2

Please add your comments below

I wish to register my opposition to the proposed development which by its nature will be large and intrusive. The proposed location will simply not be able to be supported through the existing infrastructure of roads and local services in its entirety. It will also have an adverse effect on the protected nature of Danbury and Danbury Common. It will certainly influence biodiversity and the ecology of the area.

Traffic - the main road is already at capacity. To drive through the village takes considerable time particularly at peak times. This results in small lanes being used as a rat race.

The proposed entrance near Cherry Garden will mean high volumes of traffic onto a very busy stretch of road near to school bus stops. Children from The Sandon School have to cross the road on a blind bend which is more hazardous with increased traffic. Traffic at present is often at a standstill in peak times by the proposed entrance.

Hyde Lane and Cherry Garden are very narrow lanes (single track) with tight corners used frequently by pedestrians, school children, cyclists and horse riders.

Development on site b will inevitably increase traffic on these very small lanes leading to increased risk for all using them.

Facilities- the current doctors Beaconhealth is already struggling with demand with totally inadequate provision for the area. Reviews of poor service can be read online.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Miss Sara Miller (1359944)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Miss Sara Miller (1359944)

Comment ID DNP-98

Response Date 18/06/24 21:31

Status Processed

Submission Type Web

Version 0.3

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site B: Land at Tyndales Farm West

Question 2

Please add your comments below

Strongly object - this would add an unsustainable extra flow of traffic to an already overwhelmed main road. It would also remove a much valued green walking space in the field, which we and many others benefit from using daily for dog walking, exercise, socialising etc. Furthermore, Danbury's public services including schools, GP and dentist are already full, and do not have the capacity to meet the needs of current residents, let alone new residents.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mrs Nicola Gibson (1359932)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mrs Nicola Gibson (1359932)

Comment ID DNP-99

Response Date 18/06/24 22:04

Status Processed

Submission Type Web

Version 0.3

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site B: Land at Tyndales Farm West

Question 2

Please add your comments below

I would like to object to the development of 65 houses on Tyndales Farm as I feel this is disproportionate and does not align with other local housing provision. A large additional volume of traffic generated from such a development and joining the A414 at this end of the village will further exacerbate the already congested local roads. Hyde Lane is deemed as a leafy lane and should be preserved, however, this will inevitably be used as a rat run due to the proximity of the site to the lane as well as Cherry Garden Lane. The current volume of traffic travelling through the village has already significantly increased as a result of building developments in Maldon and other surrounding villages and this should be assessed for the impact this is now causing before adding more to it. The field is currently used for growing arable crops so this will be lost as a result and it is also used by many dog walkers on a daily basis who use the public right of way across the field and value this area as a peaceful area to walk through. There are also many wild animals that use that part of the site including badgers, deer and foxes so this would disturb/destroy their natural habitats. I feel it will only be matter of time before the whole field could end up being developed for housing, if permission is granted for this section, changing this end of the village forever and not for the better. I believe the houses needed, should have been planned either for the other end of the village, closer to the A12 or distributed more evenly across the whole village instead of allocating a farmer's field for the majority Danbury had to provide.

In addition, the amount of people living in these houses will add to additional pressures on the already overstretched local gp surgery.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mrs Gill Carter (1359945)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mrs Gill Carter (1359945)

Comment ID DNP-100

Response Date 18/06/24 21:56

Status Processed

Submission Type Web

Version 0.3

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below SITE B: LAND AT TYNDALES FARM WEST

Question 2

Please add your comments below

The surrounding lanes cannot support this plan, this is a beautiful area and further housing will have a negative impact on the area, wildlife and general feeling of being in the edge of the village
The local surgery is already at capacity and struggling to cope with village numbers, the A414 is always under pressure forcing traffic onto cut through lanes making it dangerous for walkers, especially school children.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mrs Elisa Sandle (1359960)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mrs Elisa Sandle (1359960)

Comment ID DNP-102

Response Date 19/06/24 07:51

Status Processed

Submission Type Web

Version 0.3

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site D: Danecroft, Woodhill Road

Question 2

Please add your comments below

I strongly object to the proposed development above which by its nature, will be large and intrusive, and totally destroy this beautiful area surrounded by National Trust land and conservation area. Building on this site has been declined a few times already, most recently in 2010, as was deemed "Unacceptable harm to the character and appearance of the countryside, and of the locality, contrary to the policies CP5 and DC2 of the adopted core strategies" which was for just 4 houses. The proposal of 14 houses on this site would have far greater detrimental impact and I do not understand how a planning rejection for 4 houses, can result in a proposal of 14 houses on the same land. It will also have an adverse effect on the protected nature of Danbury and Danbury Common. This site has numerous, well established oak trees, frequented by a high number of bats and are vital to local habitat and must be protected. Possible removal of these trees will destroy a range of other wildlife, that I frequently see visit, including deer, badgers, squirrels, foxes, hedgehogs, a wide variety of birds and many more. I also understand that there is a pond on the Danecroft site, where newts have been spotted and an underground stream detected. There are also many heritage assets in Danbury, one of which, is an underground tunnel located at Blackmore House (previously Black Boy pub) that is very close to the vehicular access to this site. Building on this site will certainly influence biodiversity and the ecology of the area. With clay soil, major construction of houses may have an effect on the foundations of existing properties and the water table, leading to increased risk of flooding. The proposed location

will simply, not be able to be supported through the existing infrastructure of roads and local services in its entirety and just cannot support additional parking and transport facilities for 14 additional homes in such a small space. Already, Penny Royal Road, with visitors to the local pub and Danbury Common, has cars regularly and dangerously, blocking the road, all the way up on either side, which prompted the recent preventative erection of posts on a small stretch, showing a clear acknowledgement of an already existing problem. Sadly, this has just forced parking down to the junction with Woodhill road, and near the slip road outside my house, which quite honestly, is a fatal accident waiting to happen, as cars regularly speed around the corner in excess of the 40mph speed limit, on a blind bend. The National trust car park is always overflowing with visitors, who want to enjoy our local countryside. These country roads cannot withstand any further traffic. Already with the recent and ongoing huge developments built in Maldon and surrounding areas, which have a massive effect on the A414 to access, has resulted in a 'rat run' through Woodhill Road and Penny Royal Road to avoid large queues of traffic to get through Danbury. The current road closure on Woodhill road, has temporarily halted this cut through, which has resulted in queues of traffic on A414, almost back to A12 at peak times, demonstrating the volumes already trying to find a way through. We also have local facilities which are already overstretched, Beacon House GP services, over capacity, poor service, NHS dental service, over capacity, not taking on new NHS patients and schools appear over capacity too. I have lived in this beautiful area for 20 years and this development in addition to the points above, will be totally intrusive on my house, resulting in loss of privacy, and will ruin the rural aspect of the area and put tremendous pressure on infrastructure of Danbury.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mr Michael Sandle (1359964)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mr Michael Sandle (1359964)

Comment ID DNP-103

Response Date 19/06/24 08:00

Status Processed

Submission Type Web

Version 0.3

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site D: Danecroft, Woodhill Road

Question 2

Please add your comments below

I strongly object to the proposed development above which by its nature, will be large and intrusive, and totally destroy this beautiful area surrounded by National Trust land and conservation area. Building on this site has been declined a few times already, most recently in 2010, as was deemed "Unacceptable harm to the character and appearance of the countryside, and of the locality, contrary to the policies CP5 and DC2 of the adopted core strategies" which was for just 4 houses. The proposal of 14 houses on this site would have far greater detrimental impact and I do not understand how a planning rejection for 4 houses, can result in a proposal of 14 houses on the same land. It will also have an adverse effect on the protected nature of Danbury and Danbury Common. This site has numerous, well established oak trees, frequented by a high number of bats and are vital to local habitat and must be protected. Possible removal of these trees will destroy a range of other wildlife, that I frequently see visit, including deer, badgers, squirrels, foxes, hedgehogs, a wide variety of birds and many more. I also understand that there is a pond on the Danecroft site, where newts have been spotted and an underground stream detected. There are also many heritage assets in Danbury, one of which, is an underground tunnel located at Blackmore House (previously Black Boy pub) that is very close to the vehicular access to this site. Building on this site will certainly influence biodiversity and the ecology of the area. With clay soil, major construction of houses may have an effect on the foundations of existing properties and the water table, leading to increased risk of flooding. The proposed location

will simply, not be able to be supported through the existing infrastructure of roads and local services in its entirety and just cannot support additional parking and transport facilities for 14 additional homes in such a small space. Already, Penny Royal Road, with visitors to the local pub and Danbury Common, has cars regularly and dangerously, blocking the road, all the way up on either side, which prompted the recent preventative erection of posts on a small stretch, showing a clear acknowledgement of an already existing problem. Sadly, this has just forced parking down to the junction with Woodhill road, and near the slip road outside my house, which quite honestly, is a fatal accident waiting to happen, as cars regularly speed around the corner in excess of the 40mph speed limit, on a blind bend. The National trust car park is always overflowing with visitors, who want to enjoy our local countryside. These country roads cannot withstand any further traffic. Already with the recent and ongoing huge developments built in Maldon and surrounding areas, which have a massive effect on the A414 to access, has resulted in a 'rat run' through Woodhill Road and Penny Royal Road to avoid large queues of traffic to get through Danbury. The current road closure on Woodhill road, has temporarily halted this cut through, which has resulted in queues of traffic on A414, almost back to A12 at peak times, demonstrating the volumes already trying to find a way through. We also have local facilities which are already overstretched, Beacon House GP services, over capacity, poor service, NHS dental service, over capacity, not taking on new NHS patients and schools appear over capacity too. I have lived in this beautiful area for 20 years and this development in addition to the points above, will be totally intrusive on my house, resulting in loss of privacy, and will ruin the rural aspect of the area and put tremendous pressure on infrastructure of Danbury.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mr Robert Murrells (1359963)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mr Robert Murrells (1359963)

Comment ID DNP-104

Response Date 19/06/24 09:50

Status Processed

Submission Type Web

Version 0.4

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Foreword, Section 5, Section 7, Section 11

Question 2

Please add your comments below

See attached Letter

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

If you wish to submit any supporting information, please upload it here [DanburyPlanComments-RMurrells-19Jun24.pdf \(1\)](#)

R I MURRELLS – (Address redacted)

COMMENTS – Danbury Neighbourhood Plan – Regulation 15 Submission

TO: Chelmsford City Council.

Concerning the Danbury Neighbourhood Plan, I have the following comments:

Foreword

1. The Chair of the Danbury Neighbourhood Plan Steering Group comments that this plan is “Community Planning at its best” and that it “reflects the residents wishes”.
2. On principle, this plan does not reflect the residents wishes. This plan is based on the spurious results of an unrepresentative survey that is time obsolete and statistically and democratically unsound. These flaws were admitted by QA Research in their report to the parish council in December 2018.

Section 5 – Housing and Development

Site D: Danecroft, Woodhill Road

1. As previously stated in consultation to Danbury Parish Council, it is my view that if a housing allocation for the village must be made, it should be attained (as far as it can) by means of the brownfield sites, and that private infill development should be left to the usual development planning processes.
2. In that context and in the view of the nature of the site itself and the refusal of planning applications in the past, I object to the inclusion of Site D: Danecroft, Woodhill Road in the Danbury Neighbourhood Plan.
3. Two previous planning applications for this site – CHL/1653/89(1) for 14 houses in Sept.1989 and 10/00102/OUT for 4 houses in Jan. 2010 have been refused by reason of numerous significant criteria, all of which remain the same today. Nothing has changed and the site remains unsuitable for the development proposed and for inclusion in this Neighbourhood Plan.
4. Concerning the planning application in 2010, Danbury Parish Council itself submitted a “strong objection” because: i) This backland development outside the defined settlement represents creeping urbanisation and will detract from the rural character of the area contrary to policy DC12; ii) The loss of habitat will have adverse effects on local wildlife, which includes foxes, badgers, squirrels, bats and many species of bird; iii) There will be a loss of visual amenity and privacy of neighbouring residents, contrary to policy DC4, especially as the land rises towards the proposed building location; iv) The soakaway is likely to be inadequate leading to an increased risk of flooding, especially if trees are removed; v) The increase in traffic at a junction which already presents problems is contrary to policy DC43. The proposal under 10/00103/FUL will not resolve the issue.
5. I find it incredible that despite the previous application refusals, the significant issues and constraints relating to this site that Danbury Parish Council, in this plan, makes a

complete U-turn. Having taken a position previously which I would say did reflect the wishes of residents and actual neighbours of this site, I would state that the Parish Council, by virtue of this plan, does not now do so. If this really is a community plan, then Site D: Danecroft should be removed from it.

6. Development on Site D: Danecroft also contravenes the protection of Key Views Designated for Protection - Number 1 - St John's Church, south of Water Tower, and overlooking Hanningfield Reservoir. The photograph in the plan document does not properly illustrate the view towards the Reservoir and directly across the Danecroft site.

Section 7 – Transport and Movement

1. The single major issue that most affects community life in Danbury is the volume of road traffic that travels through it, both on the A414 and the “rat runs” to the south of the village connecting with Sandon/Baddow/Chelmsford/Bicknacre, the associated pollution (air and noise) that goes with it, and the speed of drivers in these areas.
2. The Plan refers only to the A414 but I think it should have a broader scope to the “rat run” routes, including reducing speed limits to 30mph or more measures to calm traffic and slow drivers down across the entire area of the village.

Section 11 – Next Steps

1. Concerning 11.9, and should there be a referendum, I object to the simplistic nature of the referendum arrangements described. The acceptance of any result should at least be conditional on there being a majority turn-out.

Yours faithfully,

R I Murrells.

Comment

Consultee Mr Richard Sandlan (1359999)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mr Richard Sandlan (1359999)

Comment ID DNP-105

Response Date 19/06/24 10:48

Status Processed

Submission Type Web

Version 0.2

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site B: Land at Tyndales Farm West

Question 2

Please add your comments below

I do not believe this site is suitable for the scale of housing suggested, this would be a sizeable housing estate in a largely rural area and seems disproportionate in terms of allocation across the village.

The village amenities are already at capacity - medical services, schools and road infrastructure. An additional 100+ cars joining the A414 at this point will be unbearable. The traffic already backs up to the roundabout at Oak corner each morning which will force cars to "rat run" through narrow lanes and surrounding local villages to avoid the congestion.

With additional houses still being built in Heybridge and Maldon, this is only going to get worse.

Other reasons this site should not be allocated are as follows;

Unsustainable development in terms of transport - the site is on the very edge of the village, outside of the main settlement areas and will not only encourage but force car journeys to all local services and amenities.

Need - with up to 4000 houses pencilled for the other end of Danbury (Hammonds Farm) why build 65 here?

Loss of agricultural land - with a climate crisis and food security being paramount, we should not allow prime agricultural land to be taken away forever.

Biodiversity - it will be displaced/lost, despite any alleged improvements, the wildlife that current lives and feeds on this land will not live and feed amongst a housing estate.

Unacceptable harm to the character and appearance of the countryside.
Should decision makers be minded to allocate this site then utmost care should be taken in terms of damage to protected species (and even unprotected species) as this area is known for Skylarks, Badgers and Barbastelle Bats, amongst others.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Agent Mr Trevor Hollinger (873460)

Email Address

Company / Organisation Aquila Developments

Address

Consultee Blenheim Consultancy Services (1355497)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Blenheim Consultancy Services (1355497)

Comment ID DNP-106

Response Date 19/06/24 10:23

Status Processed

Submission Type Web

Version 0.4

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Policy DNP 4

Question 2

Please add your comments below

Whilst Criterion 5 of the policy provides clear guidance we are puzzled by the separate reference to tree height in accompanying text at 5.62 and query its evidence base support

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Agent Ben Hatt (1360015)

Email Address

Company / Organisation Gleeson Land

Address

Consultee Ben Hatt (1360019)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Ben Hatt (1360019)

Comment ID DNP-107

Response Date 19/06/24 10:41

Status Processed

Submission Type Web

Version 0.3

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below General

Question 2

Please add your comments below

Please see attachments

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

**If you wish to submit any supporting information,
please upload it here**

[Gleeson Land - Danbury NP Consultation
Response 18.6.24.pdf](#)

**If you wish to submit any supporting information,
please upload it here**

[Appendix 1.pdf](#)

**If you wish to submit any supporting information,
please upload it here**

[Appendix 2.pdf](#)

**If you wish to submit any supporting information,
please upload it here**

[Brochure.pdf](#)

Via email to: planning.policy@chelmsford.gov.uk

Date: 18th June 2024

Dear Planning Policy Team,

Danbury Neighbourhood Plan: submission consultation Regulation 15

The following representation is submitted by Gleeson Land in relation to our land interest at Land North of Runsell Land, Danbury. The site extends to a total of 3.6ha and is situated to the west of the village on the northern-eastern side of Runsell Lane. The site is comprised of a single parcel of land in agricultural use in single ownership and is being promoted as a deliverable and developable residential scheme. A site location plan showing the site boundary edged in red is include with this submission (**Appendix 1**).

Future development on the site could provide much needed market and affordable housing on the edge of Danbury in a sustainable location, within walking distance of key services and facilities including Tesco Express (9 minute walk), St Johns C of E Primary School (11 minute walk), and Danbury Sports and Social Centre. There is also potential to contribute towards improving the supply of allotments, and youth play space to assist with the key issues raised by local residents during the preparation of the Neighbourhood Plan.

Introduction

Gleeson commends the Neighbourhood Plan Steering Group in undertaking the extensive work required to prepare a Neighbourhood Plan to help meet the development requirements for Danbury, as set out in the adopted Chelmsford Local Plan. Neighbourhood planning provides a powerful set of tools for local people to ensure they get the right types of development for their community where the ambition of the neighbourhood is aligned with the strategic needs and priorities of the wider area. As a 'Key Service Settlement' Danbury has an important role to play in delivering sustainable development, supporting not only the needs of local residents, but also those living in the surrounding area.

Vision & Objectives

The vision for a flourishing village, separate from Chelmsford, with a strong community spirit, where people of all ages will be able to enjoy Danbury's unique character and identity is supported.

The objective for housing and development to ensure high quality provision for all ages, which responds to Danbury's needs is also strongly supported. There is a need for new homes suitable for young families and particularly for affordable housing, which new development sites are able to deliver. New development can also contribute towards the recreation and leisure objective to improve Danbury's existing facilities and increase provision where a shortfall exists. Development on the east side of the village would help increase the provision in this area where there is a recognised deficiency.

New homes can also support local businesses and the local economy through an influx of new residents that will spend time and money in the village. New homes can also be designed with home working in mind with layouts conducive to home working, and by providing superfast broadband to all new residents. Providing space for home working increases the likelihood of new residents to use local services and facilities during the working week, further contributing towards local businesses.

Housing and Development

The Plan rightly identifies that one of the key issues to be addressed is to find sites to accommodate around 100 homes, as set out in the adopted Chelmsford Local Plan. Gleeson does not have any specific comments to make on the suitability of individual sites, however it is considered that there is potential for the Neighbourhood Plan to be more ambitious and seek to allocate more than 100 homes. The National Planning Policy Guidance (NPPG) at paragraph 103 states that *'Neighbourhood planning bodies are encouraged to plan to meet their housing requirement, and where possible to exceed it. A sustainable choice of sites to accommodate housing will provide flexibility if circumstances change, and allows the plan to remain up to date over a longer time scale.'* There are available and deliverable sites such as Gleeson's that would be able to provide additional homes, whilst still being in general conformity with the strategic policies of the Local Plan and when adopted the Neighbourhood Plan.

The adopted Local Plan covers the period up to 2036 and identifies the need to provide 18,515 dwellings during the period between 2013 and 2036 at a rate of 805 new homes per year. The emerging Local Plan will cover the period from 2022 to 2041, an increase of five years from the adopted Local Plan. This sets the requirement for 19,000 dwellings over the period 2022 to 2041, equating to 1,000 dwellings per annum. The adopted Local Plan allocated 100 dwellings for Danbury over that Plan Period, yet the Preferred Options version of the emerging Local Plan does not increase this requirement, despite the increased annual requirement and the extended time frame for the Local Plan. Both documents refer to 100 dwellings to be delivered through the emerging Neighbourhood Plan, yet by not allocating additional land in Danbury, the Plan is failing to meet local needs across the whole of the Plan period.

In support of these representations a Danbury Local Housing Needs (LHN) review has been undertaken by Gleeson Land (**Appendix 2**). The Danbury LHN review should be read alongside the Danbury Neighbourhood Plan LHN assessment prepared by AECOM (an assessment which we support and endorse). For ease of reference a copy of the AECOM LHN assessment has been appended to the LHN review prepared by Gleeson Land's in-house Research and Analytics team.

Collectively, the AECOM LHN assessment and the Gleeson Land LHN review provides a comprehensive assessment of Danbury's housing needs over the period covered by the Danbury Neighbourhood Plan (2021 to 2036) and the Chelmsford Local Plan Review (2022 to 2041). The key conclusions set out within the Gleeson Land LHN include:

- The National Planning Policy Framework ("the Framework") and accompanying Planning Practice Guidance ("PPG") seek to significantly boost the supply of homes where there are needed. A central strand of the Framework's sustainable development social objective is to support strong, vibrant, and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations. Adopted and emerging Local Plan policy outlines that growth is needed at Key Service Settlements to increase self-containment and enhance

their service role, reflecting the aspirations of national policy in promoting stronger communities. A key overarching objective of the emerging Danbury Neighbourhood Plan is to 'meet the housing needs of Danbury'.

- Despite Danbury being a Key Service Centre, and home to around 2.9% of Chelmsford's resident population, only around 100 dwellings is proposed over the Neighbourhood Plan and Local Plan Review periods. This equating to only 0.5% of the total proposed housing figure for Chelmsford.
- With only an increase of 115 persons between 2011 and 2021, Danbury's population growth almost stagnated over the last inter-censal period. To the detriment of the vibrancy and health of the settlement, without planned housing growth to meet identified neighbourhood needs, there is a risk Danbury's already aging population will start to decline over the Neighbourhood Plan and Local Plan Review periods.
- The Danbury Neighbourhood Plan LHN prepared by AECOM highlighted delivery of only 100 dwellings would lead to a significantly shortfall against meeting Danbury's identified affordable housing needs.
- Danbury's local housing needs over the Local Plan Review period have been identified using both 'top-down' and 'bottom-up' scenarios. The mid-point for the six scenarios considered provides a Danbury local housing needs figure of 460 dwellings over the 2022 to 2041 period. Delivery of 460 dwellings represents a housing stock increase of around 8.8% of the Local Plan Review period. A level of housing increase that is demonstrably proportionate to the size of the existing settlement and its role as a Key Service Settlement (second tier in the adopted and emerging settlement hierarchy). Over the period covered by the Danbury Neighbourhood Plan (2021 to 2036) the corresponding Danbury local housing needs figure would be 363 net additional dwellings.
- With the Neighbourhood Plan and Local Plan Review only making provision to deliver around 100 dwellings at Danbury, less than a quarter of the settlements identified housing needs is therefore currently being planned to be met.
- An aging population is an increasingly significant issue for Danbury over the emerging Neighbourhood Plan and Local Plan Review period and beyond. Indeed 14% of Danbury's population is aged 75+ compared to 9% for the wider Chelmsford area. An aging population profile has consequential implications on key local facilities and services as well as the viability and health of the settlement.
- Census data, the AECOM Local Housing Needs survey and local residents surveys undertaken as part of the Danbury Neighbourhood Plan process have collectively and repeatedly highlighted demand and need for:
 - A broad range of housing types, sizes and tenures; particularly smaller (1-bedroom and 2-bedroom) properties and medium (3-bedroom) properties that are semi-detached, terraced or purpose built flats.
 - Housing opportunities to facilitate local downsizing or sheltered / specialist later living housing.
 - Affordable housing and private rented properties.

Site selection and housing allocations

Gleeson supports the decision to include a larger site for allocation. As set out in the Plan larger sites are better able to meet Danbury's needs in terms of housing mix, affordable housing and community facilities. Smaller developments may not meet the threshold where affordable housing is required, and may not be able to viably provide additional benefits to the local area. In regards to site selection it is suggested that when considering sites in the future, the preference for sites to have direct access from Priority 1 or Priority 2 Roads needs to be balanced against the potential benefits a site could deliver and the overall appropriateness of a development, when assessed as a whole.

Sustainable Housing Design

Gleeson supports the intention of Policy DNP3 for a high level of sustainable design and construction and for new development to be optimised for energy efficiency, targeting zero carbon emissions. However it is considered that the most effective way for this goal to be achieved will be through following the national Future Homes Standard that will be delivered through building regulation changes, which will require new homes to be zero carbon ready by 2025. There is no need for these requirements to be repeated in planning policy.

By ensuring new homes meet these standards through building regulations the carbon footprint of buildings can be significantly reduced, contributing to meeting climate change targets. Additional policies in a neighbourhood plan are not necessary to achieve this goal. Neighbourhood plans are designed to provide more specific guidance on planning issues at a local level. While they can be useful for addressing certain issues, they are not necessary for delivering energy efficient homes.

Furthermore, adding additional policies to a neighbourhood plan could create confusion and lead to inconsistencies in planning policy. This could create unnecessary barriers to development and ultimately slow down the delivery of much-needed new housing.

Environment

The requirement within policy DNP6 for sites to deliver a net gain in biodiversity is supported. This should be in line with the 10% requirement in the Environment Act 2021. It may be appropriate in some cases for a net gain to be provided off-site, depending on the particular circumstances of a development.

The requirement for off-site biodiversity net gain to be provided within the Neighbourhood Plan area is not supported. There is no requirement in the Environment Act 2021 for biodiversity net gain to be provided within such a limited distance from a development site. It may be that suitable land outside the Neighbourhood Plan area is better able to deliver a net gain in biodiversity with wider benefits to the environment. Sustainable development should not be prevented if there is no land available for biodiversity net gain within the Neighbourhood Plan area. Flora and fauna are not restricted to policy boundaries and so there is no need or justification for off-site biodiversity net gain to be limited to just the Neighbourhood Plan area.

Rural and Protected Lanes

A balance needs to be struck between protecting key characteristics of the village whilst not stifling progress and preventing development to provide the new homes local people need. Whilst consideration needs to be given to protected lanes this should not be a barrier to sustainable development. Any proposed development would still need to demonstrate there has been no unacceptable harm to the character of an area.

Conclusion

To summarise the above points, Gleeson Land supports the overall intentions of the Danbury Neighbourhood Plan to meet the needs of local people and to deliver sustainable development that the village needs. The desire to protect valued areas should be balanced against the needs of local people, including those who need a new home to live in so that they can remain in the village. New development can bring a range of benefits to support the local economy and existing businesses, whilst preserving the important attributes of the village. It is considered that the number of new homes to be allocated in the Neighbourhood Plan could be increased to as a minimum meet the needs identified in the adopted Local Plan. The Local Plan requirement for Danbury is a minimum and the Neighbourhood Plan could go further and strive to deliver the homes people need now, particularly new market and affordable homes for young families that wish to live in Danbury.

Yours faithfully,

Ben Hatt
Planning Manager



Land North of Runsell Lane, Danbury, Chelmsford

| Local Housing Needs Review

June 2024

gleeson land

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Appendix 1: Danbury Neighbourhood Plan: Local Housing Needs Assessment (2020)

1. Introduction

- 1.1 National planning policy is clear that delivering a sufficient number and range of homes to meet the needs of present and future generations helps to support strong, vibrant, and healthy communities. Danbury is identified as a Key Service Settlement where 'a higher level of growth is considered suitable due to their higher level of services, facilities, and economic activity'. Growth in Key Service Settlements aims to 'increase their self-containment and enhance their service role, reflecting the aspirations of national policy in promoting stronger communities'.
- 1.2 This Local Housing Needs ("LHN") review provides an overview of the relevant planning policy and local housing needs context; and then sets out the settlements local housing needs over the period covered by the Chelmsford Local Plan Review 2022 to 2041. The LHN structure is as follows:
- Relevant Planning Policy and Guidance.
 - Local Context.
 - Danbury Local Housing Needs.
 - Summary Conclusions.

Statement of Declaration

- 1.3 This LHN review has been prepared by Mr Dominick Veasey BA (Hons), DipTP, MRTPI, who has over 20 years' professional experience as a chartered town planner. Mr Veasey is Head of Research and Analytics at Gleeson Land. Prior to Gleeson Land, he was a Director at Nexus Planning Ltd where he led the research and analytics team and advised a range of developers and housebuilders on planning, housing, demographic, socioeconomic and infrastructure capacity matters. Prior to Nexus Planning, Mr Veasey was a town planner at the Department for Communities and Local Government; and before that a regional planner at the South East England Regional Assembly / South East England Partnership Board. Mr Veasey confirms that the information and analysis within this LHN review is true, and the opinions expressed are his true and professional opinions.

2. Relevant Planning Policy and Guidance

- 2.1 This section of the LHN provides a summary of relevant planning policy and guidance that informs the assessment of Danbury's local housing need.

National Planning Policy Framework

- 2.2 The National Planning Policy Framework ("the Framework") was republished in December 2023 and is a material consideration of particular importance in relation to ensuring the Chelmsford Local Plan Review (2022-2041) is 'sound' (namely paragraph 35(d)).

- 2.3 Achieving sustainable development has been at the heart of the Framework since it was first introduced in March 2012. A central strand of the Framework's social objective (paragraph 8 (b)) is to:

"Support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations".

- 2.4 Paragraph 60 of the Framework states:

"To support the government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay."

- 2.5 Since the 2019, the Framework has been clear that the minimum number of homes needed should be informed by a local housing need assessment, conducted using the standard method in national planning guidance (paragraph 61).

- 2.6 Paragraph 63 states:

"The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes."

- 2.7 Paragraphs 67 and 68 state:

"Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations."

"Where it is not possible to provide a requirement figure for a neighbourhood area, the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body. This figure should take into account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority."

Planning Practice Guidance

2.8 The Planning Practice Guidance (“PPG”) accompanies the Framework and contains a section on ‘Housing and economic needs assessment’ that was updated on 16 December 2020.

2.9 The PPG defines housing need in the following terms:

“Housing need is an unconstrained assessment of the number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from assessing land availability, establishing a housing requirement figure and preparing policies to address this such as site allocations.”

2.10 The PPG sets out the standard method prescribed by paragraph 61 of the Framework for use by local authorities when determining its minimum local housing needs (ID: 2a-002 and 2a-004). To summarise the standard method the approach takes a ten-year average for an area from the 2014-based household projections and applies a fixed percentage uplift based on the area’s median house price to workplace-based income ratio. The resulting figure may be subject to a 40% cap, depending on when the local plan was adopted, and the figure generated by uplifting the household projections. In some locations (but not Chelmsford) a further cities and urban centres uplift is applied.

2.11 ID: 2a-010 outlines that housing need may be higher than the figure generated by the standard method, for example due to growth strategies, Housing Deals, infrastructure improvements or unmet need.

2.12 Regarding the need of specific groups, the PPG contains a section on ‘Housing needs of different groups’ that was last updated on 24 May 2021. ID:67-001 outlines amongst other things:

- The standard method for assessing local housing need identifies an overall minimum average annual housing need figure but does not break this down into the housing need of individual groups. This guidance sets out advice on how plan-making authorities should identify and plan for the housing needs of particular groups of people.
- This need may well exceed, or be proportionally high in relation to, the overall housing need figure calculated using the standard method. This is because the needs of particular groups will often be calculated having consideration to the whole population of an area as a baseline as opposed to the projected new households which form the baseline for the standard method.
- Plan-making authorities should assess the need for housing of different groups and reflect this in planning policies.
- When producing policies to address the need of specific groups, plan-making authorities will need to consider how the needs of individual groups can be addressed having regard to deliverability.

2.13 Whilst the PPG does not contain guidance on how sub-district level housing needs can be assessed, there is Government endorsed guidance in the form of the Locality ‘Housing Needs Assessment at Neighbourhood Plan Level: A toolkit for neighbourhood planners (“the Toolkit”). The ‘Neighbourhood Planning’ section of the PPG states at ID: 41-105:

“Where strategic policies do not already set out a requirement figure, the National Planning Policy Framework expects an indicative figure to be provided to neighbourhood planning bodies on request. However, if a local planning authority is unable to do this, then the neighbourhood planning body may exceptionally need to determine a housing requirement figure themselves, taking account of relevant policies, the existing and emerging spatial strategy, and characteristics of the neighbourhood area. The neighbourhood planning toolkit on housing needs assessment may be used for this purpose. Neighbourhood planning bodies will need to work proactively with the local planning authority through this process, and the figure will need to be tested at examination of the neighbourhood plan, as neighbourhood plans must be in general conformity with strategic policies of the development plan to meet the ‘basic conditions.’”

The Toolkit

- 2.14 The Toolkit was prepared by AECOM on behalf of the local authority. The overview section of the Toolkit outlines:

“Establishing future need for housing is not an exact science. As such, no single approach provides a definitive answer. However, a process that gathers a wide range of relevant data, and then makes balanced, reasonable judgements based on that data, is likely to be on the right lines.

For HNAs at a neighbourhood level, much of the existing data you need will cover your local planning authority or a housing market area, both of which are much larger than any neighbourhood plan area. As such, one particularly important consideration is the extent to which the neighbourhood diverges from the local authority or housing market average.

This reflects the fact that a single town, village or neighbourhood virtually never forms its own housing market and must therefore be assessed in the context of its wider market. For example, does it have more or fewer older people, or larger dwellings, than its local authority or housing market area average? Both considerations would help inform conclusions on the type of housing needed.

Building on this point, HNA at neighbourhood level is best thought of as a review of existing data already freely available from a range of sources to establish how many and what type of homes to plan for. As such, it is usually possible and desirable, to produce a fit-for-purpose HNA without spending time or money on primary evidence gathering. HNAs should draw on available existing (secondary) data and information to provide evidence of housing needs in the area. Primary research (e.g. survey) is only recommended where it is necessary to fill important gaps in the evidence base after existing data has been reviewed and analysed.”

- 2.15 In accordance with national guidance the Toolkit methodology has been used to inform the assessment of Danbury’s local housing needs.

Chelmsford Local Plan

- 2.16 The Chelmsford Local Plan was adopted in 2020 and covers the 2013 to 2036 period. Policy S6 makes provides to deliver at least 18,525 net additional homes over the plan period (805 dwelling per annum (dpa)). To provide flexibility and to boost the supply of housing the Plan applied a 20% buffer to make provision for a total of 21,843 new homes over the Plan period (950 dpa).
- 2.17 Danbury is identified as one of five Key Service Settlements outside of the Green Belt. Key Service Settlements being the second tier of the settlement hierarchy. The supporting text outlines a higher level of growth is considered suitable at the Key Service Settlements due to their higher level of services, facilities, and economic activity. Growth in Key Service Settlements aims to increase their self-containment and enhance their service role, reflecting the aspirations of national policy in promoting stronger communities.
- 2.18 Policy 13 outlines that 100 dwellings will be accommodated within or adjoining the Defined Settlement Boundary of Danbury over the 2013 to 2036 period.

Chelmsford Local Plan Review

- 2.19 The Chelmsford Local Plan Review covers the period 2022 to 2041. Policy S6 outlines that a minimum of 19,000 net new homes will be delivered over the 2023 to 2041 period (1,000 dpa). The proposed figure is based on the Government’s Standard Method (955 dpa), plus a small 5% uplift to help ‘significantly boost the supply of new homes’ given the City Council declared a ‘housing crisis’ in February 2022.
- 2.20 Danbury remains to be a Key Service Settlement. Policy 13 outlines that land to accommodate around 100 dwellings over the 2022 to 2041 period (5 dpa) will be made through the emerging Danbury Neighbourhood Plan.

Danbury Neighbourhood Plan

- 2.21 The Regulation 15 Danbury Neighbourhood Plan was submitted to Chelmsford City Council in March 2024. The Neighbourhood Plan covers 2021 to 2036 period.
- 2.22 Amongst other things, an undersupply of affordable housing is listed as one of the nine key issues identified for the Danbury Parish area.
- 2.23 The 'housing and development' objective seeks to ensure there is a mix of housing types, size and high-quality housing provision for all ages, which meets the housing needs of Danbury. It will also be appropriate to the same and nature of the Parish.
- 2.24 The Neighbourhood Plan allocates land to accommodate 93 new homes. This being 7 dwellings short of the adopted Local Plan housing figure for Danbury (100 dwellings over the 2013 to 2036 period). The five sites are proposed for allocation are:
- Site A: Sandpit Field, East of Little Fields: 10 dwellings.
 - Site B: land at Tyndales Farm West: 65 dwellings.
 - Site C: Ex Play Area, Jubilee Rise: 2 dwellings.
 - Site D: Danecroft, Woodhill Road: 14 dwellings.
 - Site E: Land at Copt Hill / Mayes Lane: 2 dwellings.

Danbury Housing Needs Assessment

- 2.25 The Danbury Housing Needs Assessment was prepared by AECOM and published in March 2020. The AECOM assessment focuses on affordable housing needs and housing mix and type. The AECOM assessment does not consider Danbury's overall housing figure to meet needs on the basis at the Neighbourhood Plan is being prepared using the adopted Local Plan indicative figure of around 100 dwellings over the 2013 to 2036 period. Key findings from the AECOM assessment include:
- *Of the indicative figure of around 100 dwellings proposed for Danbury up to 35 dwellings are likely to be affordable on the basis of that policy requirement. This figure is lower than the 51 households that are projected to be in need of Affordable Housing to rent over the same period and the 95 households projected to be in need of Affordable Housing for sale. If the majority of new housing is delivered through windfall development on small sites dispersed around the NA, many of these sites will not meet the requirement of providing 11 or more dwellings and so the number of Affordable Housing units will be lower still."*
 - *Increasing the proportion of smaller homes and more affordable type should help to rebalance the housing stock in favour of options that are both suitable to the population profile as it evolves over time and that will combat growing affordability challenges.*
 - *Danbury's stock of existing housing is characterised by significantly higher proportions of detached houses and homes with 7 or more rooms than Chelmsford or England.*
 - *The age profile of the Danbury population is broadly similar to that of the wider Borough, except for a substantially higher share of the population aged 45-84 – a group that is likely to reach retirement age over the Plan period to 2034 and will become the largest source of demand for housing, whether they intend to occupy the same dwellings they currently live in, or perhaps move within the community to a home better suited to the size of their household or their evolving needs.*

- *It will therefore be important that new development prioritise housing that is appropriate both to families with children and older households*
- *In the context of Danbury's unusual stock of large housing, an appropriate response would be to prioritise the supply of smaller or mid-sized dwellings.*
- *The recommended size mix of new housing focuses on dwellings of 1 to 3 bedrooms and suggests that no further large dwellings are needed.*

Policy and Guidance Summary

- 2.26 The Framework and PPG seek to significantly boost the supply of homes where there are needed. A central strand of the Framework's sustainable development social objective is to support strong, vibrant, and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations. Adopted and emerging Local Plan policy outlines that growth is needed at Key Service Settlements to increase self-containment and enhance their service role, reflecting the aspirations of national policy in promoting stronger communities. A key overarching objective of the emerging Danbury Neighbourhood Plan is to 'meet the housing needs of Danbury'.
- 2.27 To help assess sub-district local housing needs the PPG endorses the Locality 'Toolkit', which outlines that establishing future need for housing is not an exact science. As such, no single approach provides a definitive answer. However, a process that gathers a wide range of relevant data, and then makes balanced, reasonable judgements based on that data, is likely to be on the right lines.
- 2.28 Despite Danbury being a Key Service Centre only around 100 dwellings is proposed over the Local Plan Review period (5 dpa). This equating to only 0.5% of the total proposed housing figure for Chelmsford.
- 2.29 As part of the emerging Danbury Neighbourhood Plan, AECOM prepared a Danbury Local Housing Needs Assessment that focused on affordable housing and housing mix. The key findings from the AECOM assessment included:
- Against an identified affordable housing need of 10 affordable homes per annum (rounded), delivery of an annual total (market and affordable homes) of only 7 dwellings will result in a significant shortfall against Danbury's identified affordable housing needs. Danbury's existing affordable housing shortfall being one of the nine key issues cited within the draft Danbury Neighbourhood Plan.
 - A need for smaller properties to help rebalance the housing stock in favour of options that are both suitable to the settlements current and future population and housing needs profile.
 - Danbury needs a housing stock profile suitable for its significant and growing aging population structure.

3. Local Context

Study Area

3.1 In order to assess local housing needs associated with Danbury, it is necessary to define the relevant area. Danbury Parish is considered to be a sound and credible local geography, particularly given this is also the defined Danbury Neighbourhood Plan area.

Population and Households

Population

3.2 Table 3.1 identifies population growth for Chelmsford and Danbury between 2011 to 2021. Danbury's annual average growth rate of only 0.2% is quarter that for the wider Chelmsford area (0.8%).

Table 3.1: Population change 2011 to 2021

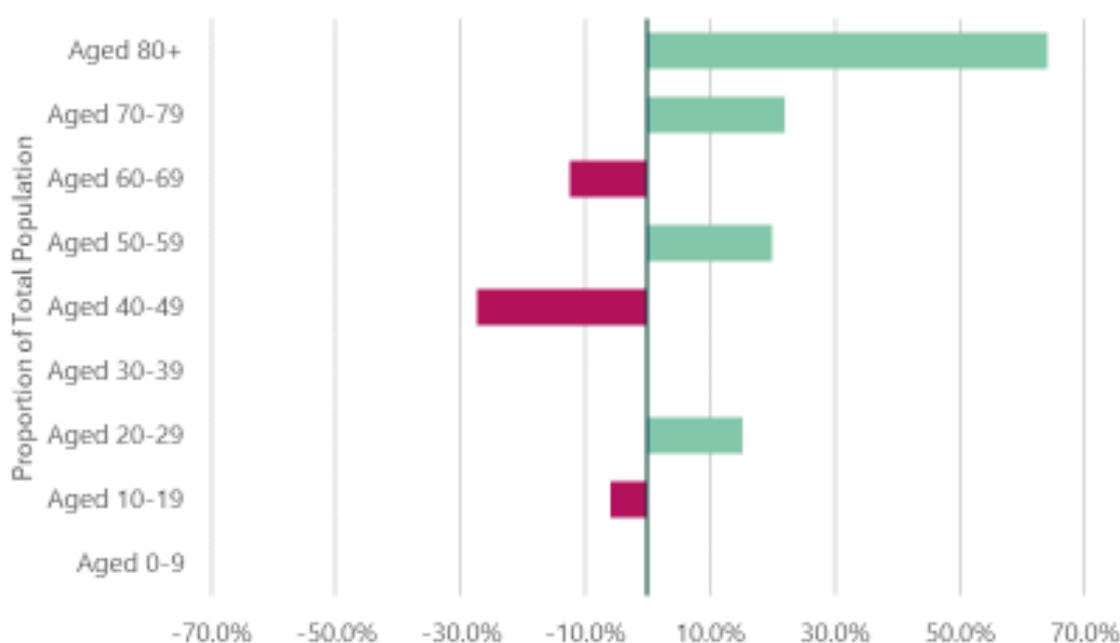
Area	2011	2021	Actual Change	Percent Change	CAGR ¹
Chelmsford	168,310	181,534	13,224	7.9%	0.8%
Danbury	5,087	5,202	115	2.3%	0.2%

Source: Census 2011 and 2021 and Gleeson Land analysis

3.3 With a total inter-censal population change of only 115 persons, Danbury's population change has effectively stagnated over the 10-year period. This is largely due to minimal planned housing growth over this period.

3.4 As illustrated within Figure 3.1 below, over the past 10-years Danbury's population aged 0-19; 40-49; and 60-69 has declined. These age groups typically associated within growing / larger family households. Conversely, the settlements positive population growth has been amongst the 20-29; 50-59 and the 70+ age cohorts.

Figure 3.1: Danbury Population Change 2011 to 2021

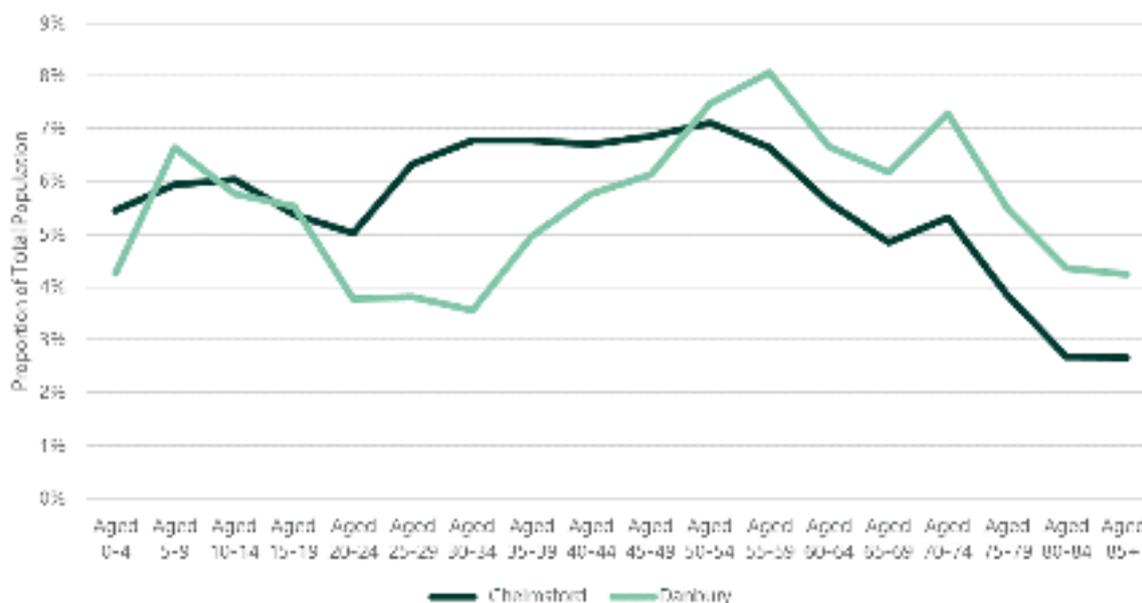


Source: Census 2021 and Gleeson Land analysis

¹ CAGR: Compound Average Growth Rate

3.5 Figure 3.2 shows the age structure of Danbury and Chelmsford. Whilst there is variance across age cohorts, Danbury has a notably lower proportion of population aged 20 to 45 (22%) compared to Chelmsford (32%). Conversely Danbury has a concerning high proportion of population aged 50+ (50%) compared to Chelmsford (39%).

Figure 3.2: Population structure (2021)



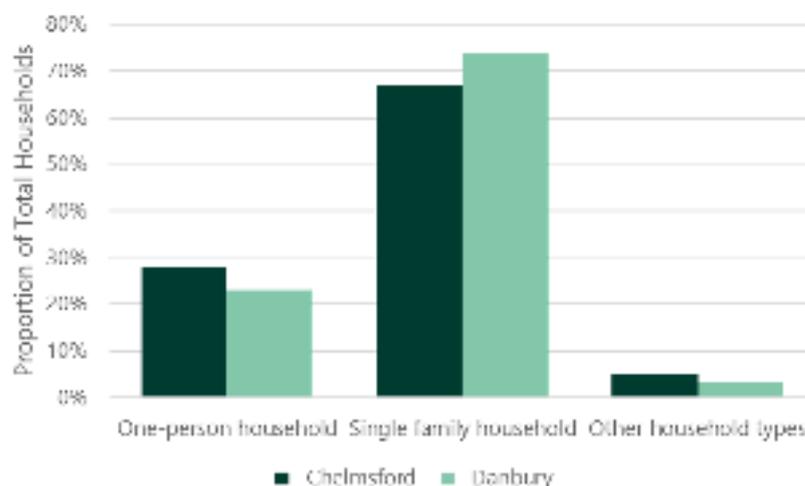
Source: Census 2021 and Gleeson Land analysis

Households

3.6 At the time of the 2021 Census there were 2,120 households within Danbury. Danbury has an average household size of 2.5 persons, which is higher than the wider Chelmsford area (2.4 persons per household).

3.7 As illustrated within Figure 3.3 Danbury has a slightly higher number of single family households (74%) compared to Chelmsford (67%); and a lower proportion of one-person households (23%) compared to Chelmsford (28%). Unsurprising given the again population structure of Danbury (Figure 3.2), 35% of households are headed by someone aged 66+. This being notably higher than the wider Chelmsford area (26%).

Figure 3.3: Household Composition (2021)

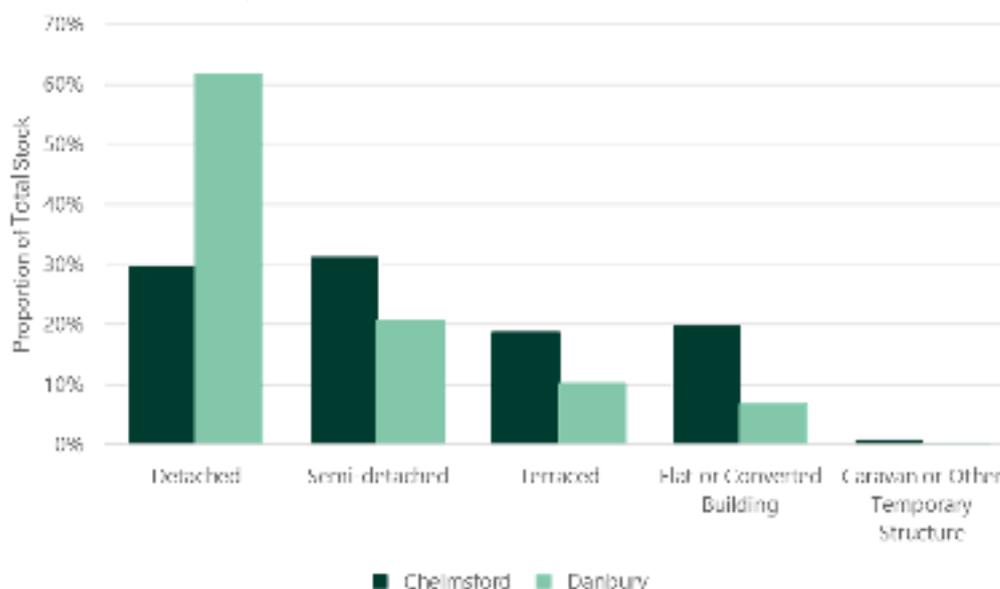


Source: Census 2021 and Gleeson Land analysis

Housing stock

3.8 Figure 3.4 shows housing stock by accommodation type for Danbury and Chelmsford. The profile for the Danbury differs compared to the wider Chelmsford area. The proportion of detached housing stock within the Danbury is notably higher (62%) compared to the wider Chelmsford area (30%). Conversely the proportion of semi-detached, terraced and flat / converted building stock is higher within Chelmsford (31%, 19% and 20% respectively) compared to Danbury (21%, 10% and 7% respectively).

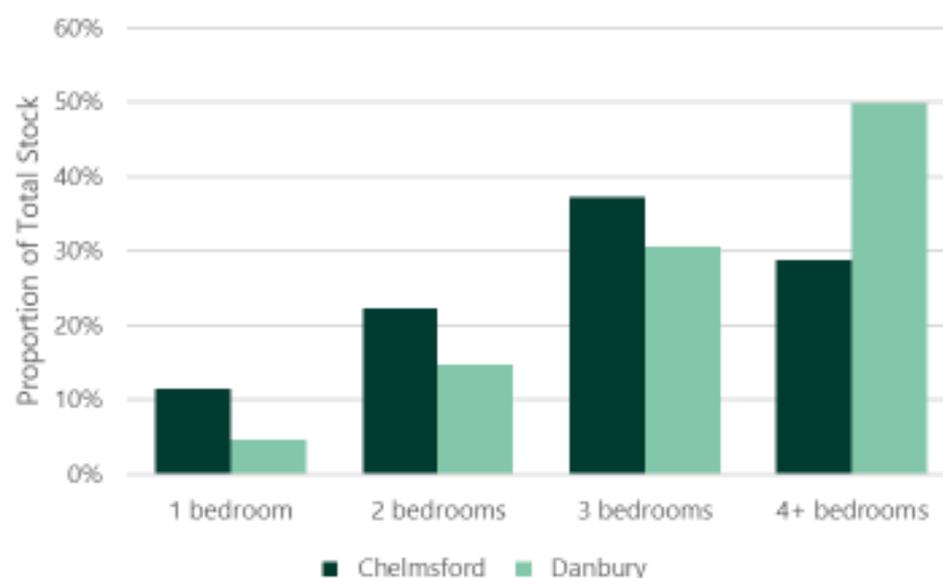
Figure 3.4: Accommodation type (2021)



Source: Census 2021 and Gleeson Land analysis

3.9 Figure 3.5 shows housing stock by number of bedrooms. Danbury has proportionally a higher number of large 4-bedroom properties (50%), compared to Chelmsford (29%). Conversely Danbury has a lower proportion of smaller 1 and 2-bedroom (20% collectively) and medium sized (3-bed) properties (31%) compared to the wider Chelmsford area (34% 1 and 3-bedrooms and 37% 3-bedrooms).

Figure 3.5: Number of bedrooms (2021)



Source: Census 2021 and Gleeson Land analysis

3.10 Figure 3.6 shows housing stock by tenure for Danbury and Chelmsford. Danbury has a higher proportion of privately owned housing stock (81%), compared to Chelmsford (70%). Danbury has a lower proportion of housing stock available to affordable housing (12%) or private rent (7%) compared to the wider Chelmsford area (14% and 16% respectively).

Figure 3.6: Tenure (2021)



Source: Census 2021 and Gleeson Land analysis

Local Context Summary

- 3.11 With only an increase of 115 persons between 2011 and 2021, Danbury’s population growth almost stagnated over the last inter-censal period. Half of Danbury’s population was aged 60+ at the time of the 2021 Census. Meeting the housing needs of an aging population is and will become an increasingly significant issue for Danbury over the emerging Local Plan period and beyond. Indeed 14% of Danbury’s population is aged 75+ compared to 9% for the wider Chelmsford area. An aging population profile has consequential implications on key local facilities and services as well as the viability and health of the settlement.
- 3.12 To help broaden housing stock availability to meet current and future housing needs a greater proportion of semi-detached, terraced, and flat / apartment housing types should be delivered.
- 3.13 Regarding housing size there is an under provision of small (1- and 2-bedroom) and medium sized (3-bedroom) housing stock to meet the needs of younger households but also older households that would potentially downside.
- 3.14 An increase affordable housing stock and properties for private rent would also help rebalance Danbury’s housing stock to help meet current and future local housing needs.

4. Danbury's Local Housing Need

- 4.1 The concept that housing need often exceeds population and household projections to boost housing supply and improve affordability has been long-established – even predating the original 2011 Framework. The concept underpinned the original (pre-2018) Framework under the Strategic Housing Market Area Assessment process, but also underpins, albeit in a more simplified form, the current (post-2018) Framework as part of the Standard Method local housing needs formula.
- 4.2 As referred above, the PPG does not contain guidance on how sub-district level housing needs can be assessed. However, in support of neighbourhood planning the Government has endorsed the Locality 'Toolkit'.
- 4.3 Drawing on the above, our assessment of local housing need for Danbury considers both 'top-down' and 'bottom-up' approaches.

Top-down Local Housing Need

Standard Method with Population Apportionment

- 4.4 The Standard Method figure for Chelmsford is 18,145 dwellings over the Plan period (955 dpa). As outlined within Table 3.1, Danbury had a population of 5,202 in 2021 this being approximately 2.9% of Chelmsford's total population (181,534).
- 4.5 The Standard Method apportionment for Danbury based on a proportional population distribution would be 526 dwellings over the period covered by the Local Plan, or 28 dpa.

Proposed Local Plan Housing Figure with Population Apportionment

- 4.6 An alternative approach for determining an appropriate top-down figure would be using a proportionate population distribution of the proposed Chelmsford Local Plan housing requirement (19,000) dwellings over the Plan period, or 1,000 dpa).
- 4.7 The proposed Local Plan housing figure population apportionment for Danbury would be 551 dwellings over the period covered by the Local Plan, or 29 dpa.

Bottom-up Local Housing Need

- 4.8 The 'bottom-up' approaches are not based on the Standard Method local housing need figure, but on local population, from which a housing need is derived based on different growth assumptions. The benefit on the 'bottom-up' approach is that it directly responds to needs arising within the locality. However, conversely the 'bottom-up' approaches do not necessarily take into account factors such as employment, market signals and affordable housing need in the same way that the 'top-down' Standard Method local housing need figure would. In view of this, the 'bottom-up' figures have applied the Chelmsford Standard Method market signals (step 2) affordability ratio (11.36) uplift.

Demographic Projection with Market Signals Uplift

- 4.9 2021-based population projections underpinned by recent 5-years demographic trends, expect Chelmsford's population to grow at 0.5% per annum over the period to 2041. This annual growth rate is marginally lower than the growth rate expected within the 2014-based projections underpinning the Standard Method calculation (0.6% growth per annum). The 0.5% annual growth rate has been applied to the population within the Danbury to determine a local housing need figure of 368 dwellings over the period covered by the submitted Plan, or 19 dpa.

Demographic Projection Scenario with 5% Flexibility Uplift

4.10 To positively 'boost the supply of housing' Local Plan applies a small 5% uplift to the Chelmsford's Standard Method local housing needs figure. In view of this, a 5% uplift to the 2021-based population projection with market signals uplift scenario results in a Danbury local housing need figure of 386 dwellings over the period covered by the submitted Plan, or (20 dpa).

AECOM 2020 LHN

4.11 Although the AECOM LHN assessment outlines that it does not provide a total housing needs figure for Danbury it is noted that the affordable housing model, which requires a total housing needs figure, uses an AECOM calculated new household formation figure of 337 households over the 2021 to 2036 period. Using a conservative 3% vacancy rate to translate households into dwellings, the AECOM assessment indicates that Danbury's total housing need over the 2021 to 2036 period is 347 dwellings (23 dpa).

4.12 The AECOM LHN derived Danbury local housing need figure is 437 dwellings over the 2022 to 2041 period (23 dpa)

Meeting Affordable Housing Needs

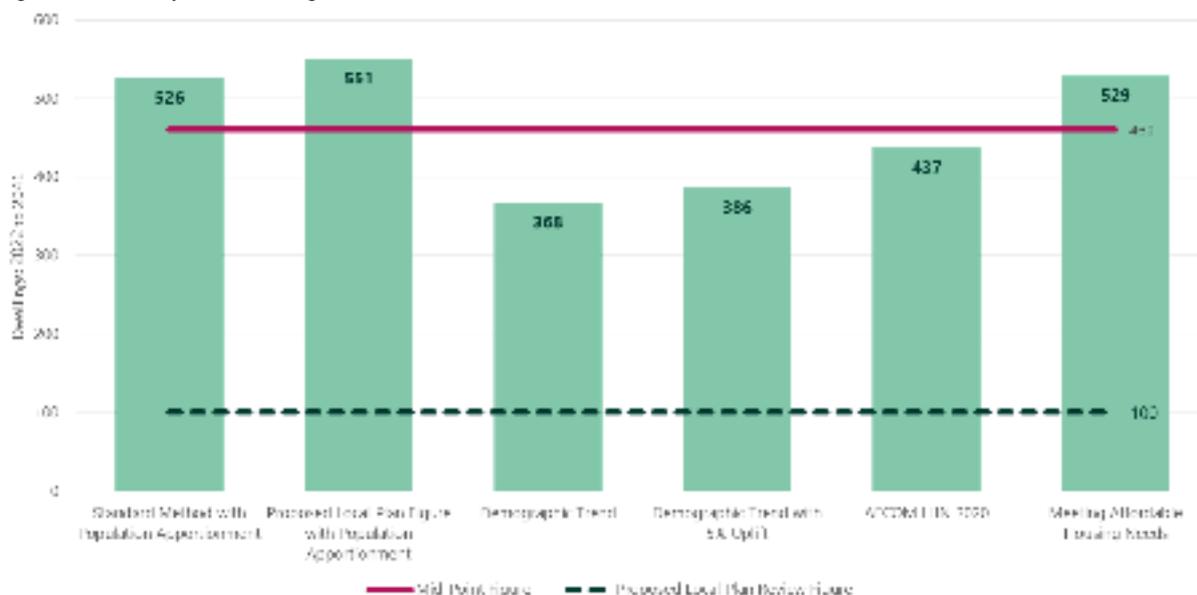
4.13 The AECOM LHN affordable housing needs model (2020) identified a Danbury annual need of 3.4 affordable rented homes and 6.31 affordable home ownership dwellings (collectively). Over the 2022-41 period this equates to a total affordable housing need of 185 affordable homes (65 affordable rented homes and 120 affordable home ownership dwellings).

4.14 Through the application of the adopted and emerging Local Plan 35% affordable housing policy requirement, delivery of 529 dwellings over the Local Plan review period (28 dpa) will be required (185 affordable homes and 344 market homes).

Danbury Local Housing Needs Conclusion

4.15 A summary of the 'top-down' and 'bottom-up' residual local housing need figures for Danbury for the period covered by the Local Plan review is provided within Figure 4.1 below. The mid-point of the six scenarios considered provides a Danbury local housing needs figure of 460 dwellings over the 2022 to 2041 period.

Figure 4.1: Danbury Local Housing Needs Scenarios – 2022 to 2041.



5. Summary Conclusions

- 5.1 The Framework and PPG seek to significantly boost the supply of homes where it is needed. A central strand of the Framework's sustainable development social objective is to support strong, vibrant, and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations. Adopted and emerging Local Plan policy outlines that growth is needed at Key Service Settlements, such as Danbury, to increase self-containment and enhance their service role, reflecting the aspirations of national policy in promoting stronger communities. A key overarching objective of the emerging Danbury Neighbourhood Plan is to 'meet the housing needs of Danbury'.
- 5.2 Despite Danbury being a Key Service Centre and home to around 2.9% of Chelmsford's resident population, only around 100 dwellings is proposed over the Local Plan Review period. This equating to only 0.5% of the total proposed housing figure for Chelmsford over the Local Plan Review period.
- 5.3 With only an increase of 115 persons between 2011 and 2021, Danbury's population growth almost stagnated over the last inter-censal period. To the detriment of the vibrancy and health of the settlement, without planned housing growth to meet identified needs, there is a risk Danbury's already aging population will start to decline over the Plan period.
- 5.4 The Danbury Neighbourhood Plan Local Housing Needs Assessment prepared by AECOM highlighted delivery of only 100 dwelling would lead to a significantly shortfall against meeting Danbury's identified affordable housing needs.
- 5.5 Within this LHN review, Danbury's local housing needs over the Plan period have been identified using both 'top-down' and 'bottom-up' scenarios. The mid-point for the six scenarios considered provides a Danbury local housing needs figure of 460 dwellings over the 2022 to 2041 period. Delivery of 460 dwellings represents a housing stock increase of around 8.8% of the Local Plan review period. A level of housing stock increase that is demonstrably proportionate to the size of the existing settlement and its role as a Key Service Settlement (second tier in the adopted and emerging settlement hierarchy).
- 5.6 With the Local Plan review only making provision to deliver around 100 dwellings at Danbury, less than a quarter of the settlements identified housing needs is therefore currently being planned to be met.
- 5.7 An aging population is an increasingly significant issue for Danbury over the emerging Local Plan period and beyond. Indeed 14% of Danbury's population is aged 75+ compared to 9% for the wider Chelmsford area. An aging population profile has consequential implications on key local facilities and services capacity as well as the overall vitality and health of the settlement.
- 5.8 Census data; the AECOM Local Housing Needs survey; and local residents surveys undertaken as part of the Danbury Neighbourhood Plan process have collectively, and repeatedly highlighted demand and need for:
 - A broader range of housing types, sizes and tenures; particularly smaller (1-bedroom and 2-bedroom) properties and medium (3-bedroom) properties that are semi-detached, terraced or purpose built flats.
 - Housing opportunities to facilitate local downsizing or sheltered / specialist later living housing.
 - Affordable housing and private rented properties.

Appendix 1

Danbury Neighbourhood Plan: Local Housing Needs Assessment (2020)



Danbury Housing Needs Assessment (HNA)

March 2020

Quality information

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5	03/03/2020	Final report	Paul Avery	Housing Research Consultant

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Disclaimer

This document is intended to aid the preparation of the Neighbourhood Plan, and can be used to guide decision making and as evidence to support Plan policies, if the Qualifying Body (i.e. the neighbourhood planning group) so chooses. It is not a neighbourhood plan policy document. It is a 'snapshot' in time and may become superseded by more recent information. The Qualifying Body is not bound to accept its conclusions. If any party can demonstrate that any of the evidence presented herein is inaccurate or out of date, such evidence can be presented to the Qualifying Body at the consultation stage. Where evidence from elsewhere conflicts with this report, the Qualifying Body should decide what policy position to take in the Neighbourhood Plan and that judgement should be documented so that it can be defended at the Examination stage.

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Appendix B : Housing Needs Assessment Glossary47

List of acronyms used in the text:

AH	Affordable Housing (NPPF definition)
HNA	Housing Needs Assessment
Housing LIN	Housing Learning and Improvement Network
HRP	Household Reference Person
CLP	Chelmsford Local Plan
LPA	Local Planning Authority
LTHPD	Long-Term Health Problem or Disability
DNP	Danbury Neighbourhood Plan
MHCLG	Ministry for Housing, Communities and Local Government (formerly DCLG)
NA	Neighbourhood (Plan) Area
NDP	Neighbourhood Development Plan
NP	Neighbourhood Plan
NPPF	National Planning Policy Framework
ONS	Office for National Statistics
PPG	Planning Practice Guidance
PRS	Private Rented Sector
RQ	Research Question
SG	Danbury Neighbourhood Plan Steering Group
SHMA	Strategic Housing Market Assessment
VOA	Valuation Office Agency
CC	Chelmsford Council

1. Executive Summary

1.1 Tenure and Affordability

1. Danbury is characterised by a relatively high proportion of home ownership, as opposed to private and social renting, when compared with Chelmsford and England as a whole. While this could be taken to indicate a housing market where home ownership is within reach of most people, a more detailed analysis of affordability reveals that this is not the case.
2. In the Danbury Survey, 95% of responses approve of the housing development vision, which states as a priority to provide suitable housing at less than the market value, indicating that most people agree market housing is widely unaffordable for the local population.
3. Indeed, the annual income required for an entry-level home (in terms of mortgage availability, and not including the cost of the necessary deposit) is double the average net household income in Danbury and just over three quarters the lower quartile gross income of a single-earner.
4. Private renting is comparatively uncommon in Danbury, despite rising significantly between 2001 and 2011 (as did shared ownership, from a low base). At the same time, the number of properties available for social rent declined by 6% as occupiers of such accommodation made purchases through the Right to Buy program.
5. **Given that social and affordable rent are the only secure tenures within reach of dual-earning households on lower quartile incomes (though some may access private rented dwellings through housing benefit), a lack of social or affordable rented dwellings is the principle affordability challenge for Danbury residents.**
6. To ensure that other households on lower than average incomes can afford to continue living in Danbury and that the high number of overcrowded households¹ can have the opportunity to form their own independent households, it will also be important to increase the quantity of affordable routes to home ownership² – especially if reforms to welfare including housing benefit are implemented in the coming years. That said, it appears that only shared ownership at a 25% share is affordable to most people.
7. Affordable Housing is typically provided and made financially viable by Borough-wide planning policies that require it to be included at a set proportion of larger market housing developments. This policy expectation in Danbury, expressed in the adopted Core Strategy and emerging Local Plan is that 35% of new housing on developments providing 11 dwellings or more will be affordable.
8. **Of the indicative figure of around 100 dwellings proposed for Danbury 35 dwellings are likely to be affordable on the basis of that policy requirement. This figure is lower than the 51 households that are projected to be in need of Affordable Housing to rent over the same period and the 95 households projected to be in need of Affordable Housing for sale. If the majority of new housing is delivered through windfall development on small sites dispersed around the NA, many of these sites will not meet the requirement of providing 11 or more dwellings and so the number of Affordable Housing units will be lower still.**
9. Since the level of expected delivery is not sufficient to meet local need as evidenced in this HNA, it is critical that the 35% delivery requirement is met wherever possible in Danbury. Should the community wish to further boost the supply of Affordable Housing there are other routes available to providing it. For example, using community development orders, identifying exception sites (explicitly supported by the emerging Local Plan Policy HO2) or developing community land trusts are all tried and tested ways of increasing the supply of affordable housing above the minima indicated by Local Plan policy.
10. It is difficult to exceed the Local Plan affordable housing policy requirement in the neighbourhood plan because such steps are rarely accepted by planning inspectors on the grounds that an extremely high standard of justification is required which goes beyond the scope of a HNA, in particular around the issue of what level of Affordable Housing delivery can be financially viable in the NA. Raising the percentage of Affordable Housing required could, furthermore, have the effect of discouraging new building from coming forward altogether. Should the group wish to consider such an option, it is advisable to discuss this with the LPA in the first instance.

¹ See glossary, page 55 for definition.

² Such as shared ownership and discounted market housing.

11. Of the 35% Affordable Housing units to be delivered in Danbury, it is recommended that approximately 64% be offered as social or affordable rent, with the emphasis on social rent and the remaining 36% delivered as affordable routes to home ownership, with the emphasis on shared ownership as opposed to discounted market housing (which is not affordable in this area).
12. However, it should be noted that in the Danbury Survey, when asked their preferred means of obtaining a new home, 98% selected home ownership and 75% selected shared ownership. Council housing and private rented/ social rented were considered unsuitable. This does not mean these tenures should not be provided at all. It does, however, point to a need to further assess demand for this product when planning for new development. This should not however, outweigh the demonstrated need for this tenure.
13. The need to improve affordability in Danbury across all tenures aligns with the findings in relation to the type and size of homes – that new residential development should ensure a substantial proportion of smaller dwellings. Increasing the proportion of smaller homes and more affordable types (as above) should help to rebalance the housing stock in favour of options that are both suitable to the population profile as it evolves over time and that will combat growing affordability challenges.

1.2 Type and Size

14. Danbury's stock of existing housing is characterized by significantly higher proportions of detached houses and homes with 7 or more rooms than Chelmsford or England. Large properties also experienced the greatest level of growth between 2001 and 2011 among all home sizes.
15. Bungalows represent a higher proportion of all housing in Danbury compared to the situation across Chelmsford as a whole, and national wide housing stock (15% of all homes in Danbury, compared with 9% in Chelmsford and 10% nationally).
16. The age profile of the Danbury population is broadly similar to that of the wider Borough, except for a substantially higher share of the population aged 45-84 – a group that is likely to reach retirement age over the Plan period to 2034 and will become the largest source of demand for housing, whether they intend to occupy the same dwellings they currently live in, or perhaps move within the community to a home better suited to the size of their household or their evolving needs.
17. It will therefore be important that new development prioritise housing that is appropriate both to families with children and older households. The needs and financial capabilities of both these groups do overlap to some extent, although the precise configuration and quality expectations that they have for smaller dwellings may vary. In the context of Danbury's unusual stock of large housing, an appropriate response would be to prioritise the supply of smaller or mid-sized dwellings.
18. The results of a life-stage modelling exercise, which looks at the sizes of dwelling occupied by different age groups and projects the growth and decline of those age groups over the Plan period in order to understand what should be built, corroborates this finding. The recommended size mix of new housing focuses on dwellings of 1 to 3 bedrooms, and suggests that no further large dwellings are needed.
19. This model, however, operates on the assumption that households can and will wish to move freely around the stock of existing housing, which is not a realistic prospect. It is natural, then, that demand should continue for some larger dwellings. The provision of larger homes should not be inhibited entirely (though some of that demand will be met by natural churn within the market), but to the extent that the community wish to influence the size mix of housing coming forward, smaller homes should be the priority.
20. That said, respondents to the Danbury Survey indicated a broadly similar preference for 2- and 3-bedroom homes to the result of the modelling exercise and the indicative housing mix set out in the CCC draft Plan. This is a further reason for flexibility in planning for the size mix of new homes, and may justify a reduction in the proportion of 1-bedroom homes that should be planned for.
21. In the Tenure and Affordability chapter analysis, it was found that market housing for sale (as opposed to market housing for rent and all types of Affordable Housing) is increasingly unaffordable and that those on the lowest incomes are unable to afford to live outside of the affordable rented sector. While Affordable Housing should be well balanced in terms of size to cater for all circumstances, the provision of smaller homes for sale and rent, as advised here, should make an important contribution to improving affordability more widely. If older households wishing to rightsize and younger ones seeking to form their own independent households are to be able to afford to live in Danbury, increasing the provision of small and mid-size homes and, in so doing, rebalancing the housing stock away from very large housing, will be key.

22. In terms of the types of dwellings required, the current predominance of detached dwellings, compared with District and national trends, suggests that there may be some unmet demand for the rarer and generally more affordable dwelling types, such as terraced homes and particularly apartments. The size recommendation for smaller homes would align with this, this would also broadly align with the survey results (shown in Figure 5-4). This might also include the delivery of bungalows in order to meet the needs of some older households and to reflect the fact that other smaller dwelling types, such as apartments, may not in practice be popular market propositions in a rural area like Danbury.
23. Bungalows do not appear to be undersupplied in comparison to the District and national trend, but they were close behind houses overall as the preferred type of dwelling among respondents to the Danbury Survey. The analysis of an ageing population suggests that a relatively high proportion of households can be expected to experience some form of mobility limitation by the end of the Plan period. To the extent that bungalows hold wide appeal among the existing population and can also be expected to meet the needs of many individuals whose mobility is limited a lot, they should be promoted in new housing where possible.

2. Context

2.1 Local context

24. Danbury is a Neighbourhood Plan area located in Chelmsford. The Neighbourhood Area (NA) boundary is synonymous with the parish boundary.
25. The proposed Neighbourhood Plan period is 2021 -2036, therefore comprising a Plan period of 15 years, and mirroring the end date of the emerging Chelmsford Local Plan.
26. Danbury is located on the eastern edge of Chelmsford District, approximately 6 miles from Chelmsford city. The city is accessed via the A414 and is also where the nearest train station is located. Danbury is significantly environmentally constrained, with three Sites of Special Scientific Interest (SSSI) located with the NA, yet Chelmsford District has high development pressures due to its location on the edge on London's Green Belt.
27. The statistics show that in the 2011 Census the NA had a total of 5,087 residents.
28. A map of the Plan area appears below in Figure 2-1 below.

Figure 2-1: Map of the Danbury Neighbourhood Plan area³



Source: Danbury application to designate a neighbourhood plan area, since approved by CC.

2.2 Planning policy context

29. In line with the Basic Conditions⁴ of neighbourhood planning, Neighbourhood Development Plans (NDPs) are required

³ Available at <https://www.neighbourhoodplanning.swdevon.gov.uk/miltonabbotlandkelly>

⁴ Available at <https://www.gov.uk/guidance/neighbourhood-planning--2#basic-conditions-for-neighbourhood-plan-to-referendum>

to be in general conformity with adopted strategic local policies.⁵ Consequently, there is a need for the relevant elements of the Local Plan to be reviewed as part of this Housing Needs Assessment (HNA).

30. In the case of Danbury, the relevant local planning context is as follows:
31. The Core Strategy and Development Control Policies was adopted by Chelmsford Council (CC) on 20th February 2008⁶. It provides a vision of future growth and the opportunity for Chelmsford to bring about positive change, regeneration and invigoration of the Borough's localities and communities.
32. The Core Strategy was reviewed in 2013⁷ to ensure it was consistent with the 2012 National Planning Policy Framework.
33. The emerging draft Chelmsford Local Plan (CLP)⁸ will supersede the current adopted Plans. It outlines the priorities and long-term vision for Chelmsford and identifies locations for delivering housing and other strategic development needs such as employment, retail, leisure, community and transport development. This Plan was expected to be adopted in December 2018. However, it is currently at Regulation 19 stage, with the draft published in January 2018. As such it should be given significant weight and considered as a material consideration in planning decisions.

2.2.1 Policies in the adopted Core Strategy and Core Strategy Review⁹

Table 2-1: Summary of Chelmsford adopted policies having relevance to the Danbury HNA

Policy	Provisions
CP6 Promoting Urban Renaissance	The Council will promote sustainable urban living through development proposals that support a diverse range of uses where people live, work and enjoy leisure time. The strengthened viability of principle neighbourhood centres (including Danbury) will play a part in delivering this policy.
CP15 Meeting the Housing Needs of Our Communities	New residential development will be expected to provide a proportion of affordable homes and the allocation of rural exception sites for 100% affordable housing for local need will be supported. When considering development proposals, the Council will take into account the latest local housing market conditions, housing needs, the nature, character and context of the site and any specific requirements of the proposal.
DC30 Protecting Existing Housing	The change of use or redevelopment involving the loss of existing housing and all units capable of residential use will not normally be permitted.
DC31 The Provision of Affordable Housing	The Council requires the provision of 35% affordable housing to be provided within all new residential development on sites which have a capacity of 15 or more dwellings, comprise an area of 0.5ha or more or lie within a small rural defined settlement and have a capacity for 5 or more dwellings.
DC32 Rural Housing Need	Affordable housing on small sites within or adjoining small rural defined settlements which would not otherwise be released for housing may be granted planning permission.

⁵ However, this does not affect the potential for the evidence base underpinning the emerging local plan to inform or form part of the evidence base for the neighbourhood plan.

⁶ Available at: <https://www.chelmsford.gov.uk/planning-and-building-control/planning-policy-and-new-local-plan/existing-local-plans/>

⁷ Available at: <https://www.chelmsford.gov.uk/planning-and-building-control/planning-policy-and-new-local-plan/existing-local-plans/>

⁸ Available at: <https://www.chelmsford.gov.uk/planning-and-building-control/planning-policy-and-new-local-plan/new-local-plan/>

⁹ Note that only those policies considered relevant to this Housing Needs Assessment have been reviewed, and that the policies reviewed may have been edited for relevance and/or clarity. As such, this summary of relevant policies should not be considered a full summary of the Local Plan in question. The policies are conveniently presented at <https://plymswdevonplan.co.uk/policy>.

Policy	Provisions
DC35 Specialist Residential Accommodation	Proposals for specialist residential accommodation, including elderly and groups that require specialist social support, are supported provided that they are located within main urban areas, within a defined settlement with appropriate facilities and services or as an integral part of a new neighbourhood.
DC36 Accessible and Adaptable Developments	<p>All new developments, and particularly housing, shall promote inclusive design, and ensure that all measures needed to promote accessibility and adaptability are achieved in a visually acceptable manner. This will relate to both facilities needed in the wider public realm and to the individual access arrangements for each building.</p> <p>All new housing developments should seek to meet the Lifetime Homes Standard with a minimum of 3% of new dwellings on developments of 30 dwellings or more built to full wheelchair standards.</p>

2.2.2 Policies in the new draft Chelmsford Local Plan

Table 2-2 Summary of Chelmsford emerging policies having relevance to the Danbury HNA

Policy	Provisions
Strategic Policy S8 – Housing and Employment Requirements	A minimum of 18,515 net new homes at an average annual rate of 805 net new homes per-year should be provided in the period 2013-2036.
Policy HO1- Size and Type of Housing	The Council will protect existing housing from redevelopment to other uses. The policy outlines the requirements for different amounts of type and size of housing in accordance with overall number of dwellings proposed.
Policy HO2 – Affordable Housing and Rural Exception Sites	<p>Developments of 11 dwellings or more or combined floorspace of 1,000 sqm will be required to provide 35% affordable housing. The type and mix of affordable housing must meet the identified housing need.</p> <p>Permission for affordable housing on small sites within designated rural areas which would not otherwise be released for housing in order to meet local need, will often be supported.</p>

2.2.3 Quantity of housing to provide

34. The NPPF 2018 requires, through paragraphs 65 and 66, Local Authorities to provide neighbourhood groups with a definitive or an indicative number of houses to plan for over the Neighbourhood Plan period.
35. Chelmsford has fulfilled that requirement by providing Danbury with an indicative figure of around 100 dwellings to be accommodated within the Neighbourhood Plan area by the end of the Plan period.
36. Given that the NPPF requirement for the Local Authority to provide the neighbourhood group with a housing number has already been fulfilled, the question of how many houses to plan for has already been answered. It is therefore outside the scope of this Housing Needs Assessment; for this reason, the issue of quantity has been excluded from the Research Questions (see Chapter 3 below).

3. Approach

3.1 Research Questions

37. Research Questions, abbreviated to 'RQs', are formulated at the start of the project through discussion with the neighbourhood planning group. They serve to direct our research and provide the structure for the HNA.
38. Below we set out the RQs relevant to this study, as discussed and agreed with the Danbury Neighbourhood Plan Steering Group (SG) which is a subcommittee of Danbury Parish Council, who are preparing the Neighbourhood Plan.

3.1.1 Tenure and Affordability

39. The SG would like to understand the needs of the community for housing of varying tenures, as well as the relative affordability of those tenures that should be provided to meet local need now and into the future.
40. This evidence will allow Danbury to establish the right conditions for new development to come forward that is affordable, both in the broader sense of market housing attainable for first-time buyers, and as Affordable Housing for those who may be currently priced out of the market.

RQ 1: What quantity of Affordable Housing and what blend of tenures should be planned for over the Neighbourhood Plan period?

3.1.2 Type and Size

41. Danbury Parish Council is seeking to determine what size and type of housing would be best suited to the local community. This will ensure future development truly reflects what residents need.

RQ 2: What type (terrace, semi, bungalows, flats and detached) and size (number of bedrooms) of housing is appropriate for Danbury over the Neighbourhood Plan period?

3.2 Relevant Data

3.2.1 Local authority evidence base

42. It is reasonable and appropriate for neighbourhood planners to refer to existing needs assessments prepared by the Local Planning Authority (LPA) as a starting point. As Danbury NA is located within Chelmsford's planning area, we therefore turned to the relevant Strategic Housing Market Assessment, which is known as the Braintree, Chelmsford, Colchester, and Tendring Councils Strategic Housing Market Assessment Update (2015)¹⁰ (hereafter abbreviated as the SHMA).
43. The SHMA is formed of four parts: Part 1 addresses the housing market area and objectively assessed cost and affordability; Part 2 addresses the type and tenure of future housing need; Part 3 addresses the need for Affordable Housing; and Part 4 addresses the requirements of specific groups of the population.
44. For the purpose of this HNA, data from Chelmsford's own evidence base to support their housing policies has been considered applicable and relevant unless it conflicts with more locally specific and/or more recently-produced evidence. The housing market evidence draws upon a range of data including population and demographic projections, housing market transactions, and employment scenarios. As such, it contains a number of points of relevance when determining housing need within the Neighbourhood Plan area, and therefore has been referenced as appropriate.

3.2.2 Other relevant data

45. In addition to the Chelmsford evidence base, we have assessed other evidence to ensure our study is robust for the purposes of developing policy at the neighbourhood plan level and is locally specific. This includes data from both Census 2001 and 2011, as well as from a wide range of other data sources, including:
 - Land Registry data on prices paid for housing within the local market;

¹⁰ Available at: <https://www.chelmsford.gov.uk/planning-and-building-control/planning-policy-and-new-local-plan/new-local-plan/evidence-base/>

- Population and household projections produced by the Office of National Statistics (ONS);
- Information on current property asking prices, for housing for sale or rent, from [home.co.uk](https://www.home.co.uk);
- Valuation Office Agency (VOA) data on local housing stock by dwelling type; and
- Neighbourhood-level survey and consultation work giving further detail. In the case of Danbury, this comprises a review of responses to a residents' questionnaire published on 21st December 2018. This will be hereafter referred to as the Danbury Survey.

4. RQ 1: Tenure and Affordability

RQ 1: What quantity of Affordable Housing and what blend of tenures should be planned for over the Neighbourhood Plan period?

4.1 Introduction

46. Tenure refers to the legal arrangements in place that enable a household to live in their home; it determines householder rights and influences the level of payments to be made in return for these rights. Broadly speaking, tenure falls into two categories, Affordable Housing and market housing, depending on whether the household benefits from a subsidy of some sort to enable them to live in their home.
47. This section will examine the tenure of dwellings in the current stock and recent supply. Then, looking at affordability, we will make an assessment on whether continuation of these trends would meet future needs. We will also investigate whether there are misalignments between the supply of different tenures of housing and local need. Such misalignments can justify policies that guide new developments to prioritise certain tenures, to bring supply and demand into better alignment.¹¹

4.2 Definitions

48. It is necessary at this stage of the study to make clear the distinction between Affordable Housing as planning terminology and the colloquial meaning of the phrase. In the course of this study, we refer to Affordable Housing, abbreviated to 'AH'. AH comprises those forms of housing tenure that fall within the definition of Affordable Housing set out in the current NPPF: social rent, affordable rent, affordable private rent (brought forward by build to rent schemes), and forms of AH designed to offer affordable routes to home ownership.¹²
49. The definition of Affordable Housing set out in the NPPF makes clear the Government's commitment to home ownership, but recognises the important role of social, affordable, and private rent tenures for those not currently seeking home ownership.
50. The revisions seek to broaden the definition of AH (which had previously referred only to social and intermediate housing) to include a range of low-cost housing opportunities for those aspiring to own a home.
51. In paragraph 64 of the NPPF, the Government introduces a recommendation that "*where major housing development is proposed, planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership*". In line with PPG,¹³ the assumption should be that a 'major housing development' can be defined as a site of 10 dwellings or more, and that affordable home ownership includes discounted market homes, shared ownership homes, and homes available for discount market sale.

4.3 Current tenure profile

52. In order to set a baseline for our examination of tenure, it is necessary to present a picture of the Neighbourhood Plan area (NA) based on the most recent reliable data. Table 4-1 below presents Census data from 2011; this table shows the distribution of how households occupy their homes within the plan area, compared to the rest of Chelmsford and England.
53. As seen at higher level geographies, the vast majority of homes in Danbury are owned. The next most common tenure is social rent, followed distantly by private rent at a rate far below that seen for Chelmsford and England as a whole. This lack of private rented stock may contribute to affordability challenges faced by local people and mean that, due to a lack of this stock, prices of private rented accommodation are higher and may cause an overreliance on the social rented sector or the use of housing benefits in private rented dwellings.

¹¹ PPG Paragraph: 021 Reference ID: 2a-021-20160401, available at <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

¹² NPPF 2019.

¹³ PPG 031 Reference ID: 23b-031-20161116, available at <https://www.gov.uk/guidance/planning-obligations>

Table 4-1: Tenure (households), 2011

Tenure	Danbury	Chelmsford	England
Owned; total	80.1%	73.2%	63.3%
Shared ownership	0.4%	0.6%	0.8%
Social rented; total	12.3%	13.1%	17.7%
Private rented; total	6.0%	12.0%	16.8%

Sources: Census 2011, AECOM Calculations

54. In Table 4-2, we note the changes in the way households have occupied housing in Danbury during the intercensal period. The greatest apparent change occurring in the NA was the increase in shared ownership, however this growth rate is due to a very low starting number, with the total increasing from three to nine. In addition to this, the social rented sector experienced a fairly significant reduction which does not follow the pattern of the district and national figures. This may be due to strong take-up from the Right to Buy program.
55. Another point of note is the large increase in private rented housing, which does match with the district and national levels. However, this is again linked to a relatively small starting figure of 53 dwellings. In any case, the growth of private renting likely points to the declining affordability of home ownership.

Table 4-2: Rates of tenure change, 2001-2011

Tenure	Danbury	Chelmsford	England
Owned; total	-0.1%	1.0%	-0.6%
Shared ownership	200.0%	53.6%	30.0%
Social rented; total	-6.4%	9.2%	-0.9%
Private rented; total	132.1%	120.9%	82.4%

Sources: Censuses 2001 and 2011, AECOM Calculations

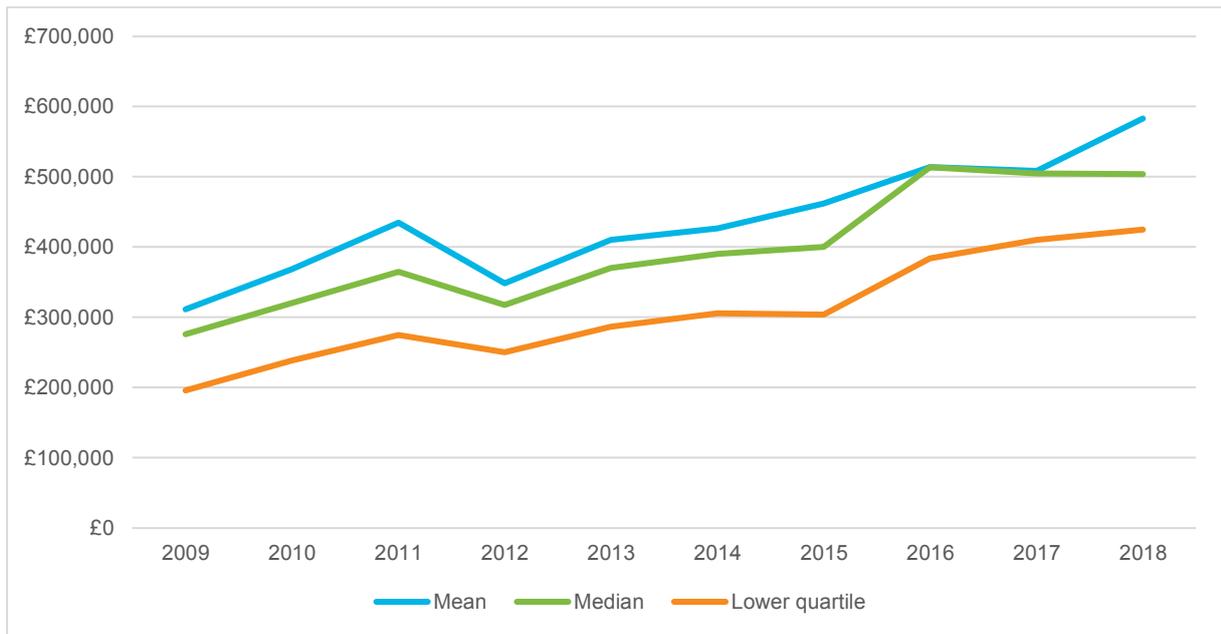
4.4 Affordability

56. Having reviewed both the tenure of the existing housing stock in the Danbury area we now turn to assessing future provision over the Plan period.
57. In order to understand whether the tenure profile of the current stock reflects the needs of the population currently and over the Plan period, an important starting point is to consider whether this profile provides different market segments access to dwellings of a suitable type and size, given their household composition.

4.4.1 House prices

58. We begin by considering the price of market housing, in particular the costs of entry-level dwellings. An entry-level dwelling can also be understood as one suitable for a household comprising two or three individuals. In order to be in conformity with Government guidance on overcrowding, such a home would require three habitable rooms (i.e. a flat or house with one or two bedrooms). Entry-level properties can therefore also be understood as one or two-bedroom flats/houses.
59. Figure 4-1 examines selected measures of house prices in Danbury. It shows that house prices in all categories have increased substantially over the 10-year period, despite a slight contraction in 2012. Lower quartile price trends roughly follow those of the median and mean, with a lower degree of volatility.

Figure 4-1: Average house prices Danbury between 2009 and 2018



Source: Land Registry PPD

60. Figure 4-2 below, taken from the SHMA, helpfully shows how lower quartile house prices across the Borough have risen out of step with local incomes, which have fluctuated but remained similar over the past decade.

Figure 4-2: Earnings compared with lower quartile prices, Chelmsford



Source: Land Registry via CLG; Annual Survey of Hours and Earnings

Source: Baintree, Colchester, Chelmsford and Tendring SHMA (2015)

61. Table 4-3 below breaks down house prices by type of house, as recorded by Land Registry Price Paid Data (PPD). It shows that detached homes are substantially more expensive than other types on average. Although flats appear to have appreciated by the greatest amount over the period, the 2018 average price data upon which that growth rate is based appears to be an anomaly (in both 2009 and 2018) that may be due to a small sample size (there are only 113

flats in Danbury). The price of semi-detached homes, which has nearly tripled over the period, is however a consistent trend that shows just how quickly the affordability of market housing has declined in recent years.

Table 4-3: House prices by type in the Danbury plan area, 2008-2017

Type	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	Growth
Detached	£407,765	£494,087	£501,517	£400,384	£454,886	£479,641	£552,986	£607,487	£585,121	£724,412	77.7%
Semi-detached	£185,133	£225,300	£265,499	£274,000	£307,231	£292,200	£337,882	£452,026	£486,000	£504,893	172.7%
Terraced	£231,833	£217,070	£203,750	£278,333	£597,569	£397,833	£393,660	£391,999	£455,222	£339,375	46.4%
Flats	£51,250	£172,500	£197,500	£287,250	£188,750	£222,750	£176,273	£457,222	£193,333	£368,333	618.7%
All Types	£311,498	£368,607	£435,030	£348,907	£410,044	£426,449	£462,331	£513,785	£508,522	£583,133	87.2%

Source: Land Registry PPD

4.4.2 Income

62. Household incomes determine the ability of households to exercise choice in the housing market, and consequently the level of need for affordable housing products. As such, we have used two sources of data for household incomes in the NA.
63. The first is locally specific but limited to the average total household income. This is the average household income estimates published by ONS at the level of the Middle-layer Super Output Area (MSOA). In the case of Danbury, the MSOA most suitable for use as a proxy for the Neighbourhood Plan area boundary is E02004500. Further details on the extent of this MSOA, including a map, and why it was selected as a proxy for the Neighbourhood Plan area, are set out in Appendix A.
64. The average total annual household income was £54,600.
65. The second source of data provides the Lower Quartile (LQ) average income that is helpful for understanding affordability challenges among those with lower than average incomes, but it is only available at the District level and so is less locally-specific.
66. It is derived from ONS annual estimates of paid hours worked and earnings for UK employees to local authority level. Although 2018 provisional data has been published, the revised 2017 data is considered more robust and is therefore used here.
67. Chelmsford's gross LQ weekly income for 2017 was £294, or approximately £15,309 per year. This is the LQ income before taxes for individual earners but only correlates with the measure of household incomes above for single-person households. To estimate the income of LQ-earning households with two earners, we have doubled the annual income, to £30,618.

4.4.3 Affordability Thresholds

68. In order to gain a clearer understanding of local affordability, it is also useful to understand what levels of income are required to afford different tenures. This is done using 'affordability thresholds'. Purchase thresholds denote the standard household income needed to access mortgage products, and income thresholds denote the maximum share of a family's income that should be spent on accommodation costs.
69. We have determined thresholds for: entry-level market purchase; entry-level private rent; shared ownership at 25%, 50%, and 75%; discounted market sale, affordable rent set at 80% of private rents, and estimated social rent levels in Danbury. These calculations are detailed in Appendix A. The key assumptions made in assessing the affordability of different tenures are explained alongside the calculations, but it is worth noting here that we have assumed that the maximum percentage of household income that should be spent on rent is 30% and that mortgage financing will be offered at a maximum of 3.5 times household income. These assumptions will not apply in all circumstances, and it is perhaps more realistic to expect that most households will spend a higher percentage than 30% of their incomes on housing costs.
70. The Government's proposed First Homes product would provide a minimum discount of 30% on new homes.¹⁴ New build prices are not available at the neighbourhood level because the number of transactions is too low. However,

¹⁴ The consultation on this new product is available to read here: <https://www.gov.uk/government/consultations/first-homes>.

median average prices provide a reasonable proxy for the price of new homes. In Danbury, a 30% discount on average prices would not be sufficient to extend home ownership to households on median incomes, nor would even a 40% discount.

71. Table 4-4 below shows the annual cost of different tenures and the income and deposit required to support these costs within Danbury.

Table 4-4: Affordability thresholds in Danbury (income required)

Tenure	Cost of purchase	Annual rent	Income required	Deposit required
Entry-level market sale	£425,000	N/A	£109,286	£42,500
Shared ownership (75%)	£286,875	£10,625	£92,589	£28,687
Discounted market sale (20% discount)	£306,000	N/A	£87,429	£30,600
Shared ownership (50%)	£191,250	£21,250	£75,893	£19,125
Shared ownership (25%)	£95,625	£31,875	£59,196	£9,562
Entry-level market rent	N/A	£17,671	£58,845	N/A
Affordable rent	N/A	£8,358	£27,832	N/A
Social rent	N/A	£5,283	£21,131	N/A

Source: AECOM Calculations

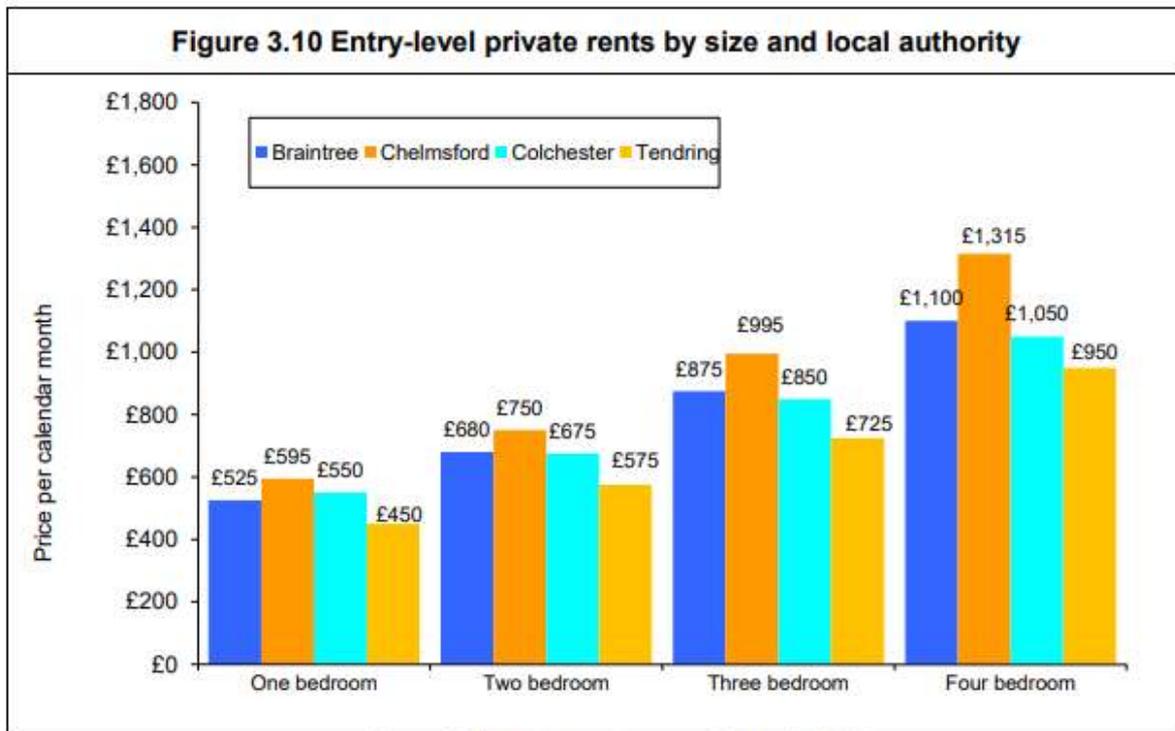
72. The income required to afford the different tenures is then benchmarked, in Figure 4-4 below, against the three measurements of household income set out previously. These are the average total household income for the local area at £54,600 and the lower quartile gross household income for Chelmsford at £15,309 for single-person households and £30,618 for dual-earning households.
73. Looking at the affordability thresholds set out above, it is apparent that single-earning households on lower quartile incomes are unable to afford any of the housing tenures under consideration. However, the lower quartile income data is gross, and therefore does not reflect housing benefits or other forms of financial assistance. For this reason, it is possible that many such single-person households would also be able to meet their housing needs in social rented and 1 bedroom dwellings for private rent, which will be cheaper than the 2 bedroom dwellings used here, or rooms in a shared house.
74. For dual-earning households on LQ incomes, only the social rented and affordable rented sector is within reach. These households are not close to being able to afford the next most affordable tenure (entry-level market rent) and so will require affordable rented housing. However, it is possible that housing benefits and financial assistance could enable such households to rent privately, if appropriately priced options are available.
75. For households on median incomes, social rent, affordable rent, entry-level market rent and shared ownership (25%) are accessible. Although there is a relatively big gap between the income required to afford market home ownership and market private renting, which could be usefully filled by affordable home ownership products, in Danbury's case the majority of such tenures are not within reach. Because there are also comparatively few private rented dwellings in Danbury, it may therefore be advantageous for more private rented dwellings to be supplied, provided they are accessible at entry-level rents. Since entry-level market rents are affordable to households on median incomes, it follows that rent-to-buy would also be affordable if there is appetite among Registered Providers of affordable housing in the area.
76. Government policy aimed at tackling the housing crisis continues to focus on helping those on modest incomes and others who are unable to afford market housing for purchase, such as younger buyers, to access affordable routes towards homeownership.¹⁵ In the case of Danbury, the most appropriate tenure to help implement this policy goal locally is shared ownership, while discounted market homes are not particularly affordable. As explored in greater detail in Appendix A, the cost of discounted market homes may be higher still in practice due to ambiguity in the way that prices are set, and it is worth bearing in mind that the price of a lower quartile dwelling used as a baseline

¹⁵ See the White Paper 'Fixing Our Broken Housing Market', at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/590464/Fixing_our_broken_housing_market_-_print_ready_version.pdf

throughout this analysis includes existing housing and so may not reflect the price premium normally associated with new build housing.

- 77. For context, Figure 4-3 below demonstrates the cost of entry level private rents by size for the Housing Market Area, showing Chelmsford as dark yellow. This HNA uses two-bedroom as a standard for the private rented sector which renders it an unaffordable option for lower quartile (both single and dual earning) and for those on a median income. Figure 4-3 however, demonstrates the price difference per number of bedrooms for this sector, it would be reasonable to suggest that those on a median income would be able to afford a one-bedroom private rented property.

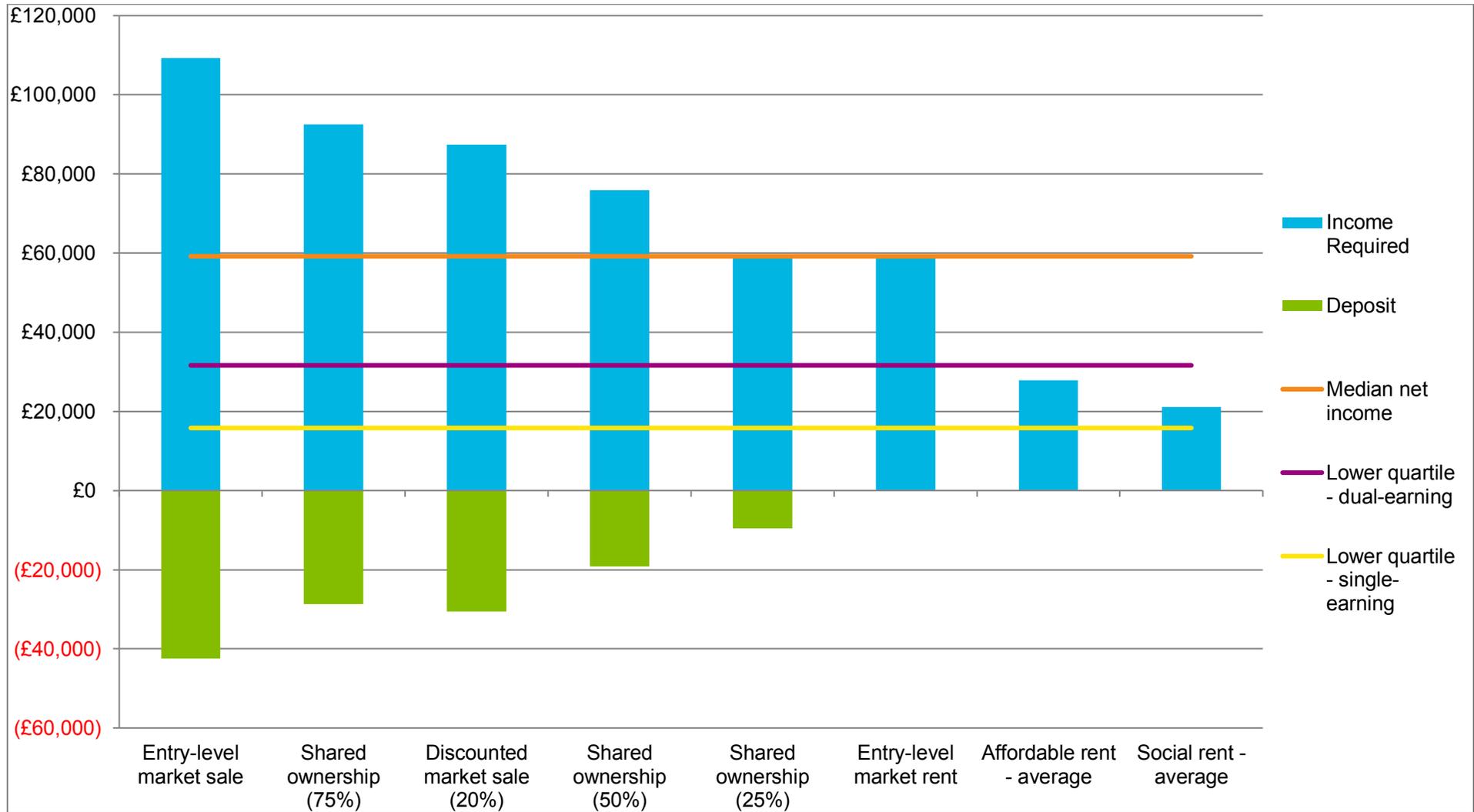
Figure 4-3: Entry level private rents by size in Chelmsford, by number of bedrooms



Source: Online estate agents survey September 2015

Source: *Baintree, Colchester, Chelmsford and Tendring SHMA (2015)*

Figure 4-4: Affordability thresholds in Danbury (income required)



Source: AECOM Calculations

4.5 Affordable rented housing- quantity needed

78. The SHMA calculates the need for affordable housing within Chelmsford. However, the SHMA was published in 2014 and therefore predates new NPPF guidance including households who can't afford to buy but can afford to rent within the definition of those in need of Affordable Housing. It therefore it gives an overall affordable housing need figure that doesn't reflect this distinction. The SHMA calculation also deducts committed supply from need, which builds in an assumption of supply that may not be realistic in practice. For these reasons it is not considered appropriate to pro rate the need identified in the SHMA to Danbury.
79. Therefore, AECOM has undertaken two calculations, the first to estimate the need for affordable rented housing and the second to estimate the need for affordable home ownership products.
80. The first calculation estimates the number of households who cannot afford any tenure of housing in Danbury currently, plus the number of new households who will fall into need over the plan period. These households will therefore require social rent or affordable rented housing.
81. Table 4-5 below identifies the annual need amounting to 3.4 households per year or 51 households in total over the plan period 2021-2036.

Table 4-5 Estimate of the need for affordable rent housing, Danbury

Stage and Step in Calculation	Total	Description
STAGE 1: CURRENT NEED		
1.1 Local Authority waiting list	95.50	Latest waiting list data available from MHCLG Local authority housing statistics data return (households in priority need). Pro rata for the NA. Neighbourhood level data not available from LA.
1.2 NA overcrowding	31.00	2011 Census overcrowding in Danbury parish (assuming that the 14 concealed households at that time are also counted in overcrowding statistics)
1.1 Current households in need	126.50	
1.2 Per annum	8.43	1.1 divided by the plan period 2021-2036
STAGE 2: NEWLY ARISING NEED		
2.1 New household formation	337.49	MHCLG 2014-based household projections for the LA between start and end of plan period. % increase applied to NA
2.2 Proportion of new households unable to rent in the market	19.33%	(1.1 + 2.2.1 + 2.2.2) divided by number of households in NA
2.2.1 Current number of social renters in NA	312.91	2011 Census + LA-level % increase (MHCLG, Live Table 100)
2.2.2 Number of private renters on housing benefits	12.86	Housing benefit caseload May 2018. Pro rata for NA.
2.3 New households unable to rent	65.24	2.1 * 2.2
2.4 Per annum	4.35	2.3 divided by plan period 2021-2036
STAGE 3: SUPPLY OF AFFORDABLE HOUSING		
3.1 Supply of social/affordable re-lets (including transfers) %	3.00%	Assumed proportion of stock re-let each year
3.2 Supply of social/affordable re-lets (including transfers)	9.39	3.1 x NA social rented stock (2.2.1)
NET SHORTFALL (OR SURPLUS) OF RENTED UNITS PER ANNUM		
Overall shortfall (or surplus) per annum	3.40	1.2 + 2.4 - 3.2

Source: AECOM model, using Census 2011, English Housing Survey 2018, CLG 2014 based household projections and net additions to affordable housing stock. Figures may not sum due to rounding.

82. The next calculation estimates the number of households who can afford to rent in the market but cannot afford to buy. The needs and aspirations of this group have become a priority of Government in recent years and this now reflected in revisions to the NPPF which include affordable home ownership products within the definition of Affordable Housing.
83. In order to provide an estimate for those who cannot afford to buy in the market in Danbury, to complement the calculation for those who require affordable rented products, AECOM has produced an additional estimate.

84. **Error! Reference source not found.** estimates the number of households who might need affordable home ownership. This is a simplified assessment of the needs of these households, but considered reasonable and proportionate for the purposes of neighbourhood planning. These are households who can afford to rent in the market but cannot afford to buy and may prefer to do so. These households are additional to the 3.4 households per annum identified above (although there may be some overlap at the margins). This estimate suggests there may be potential demand for around 6.3 affordable home ownership dwellings per annum, or 95 in total over the plan period.

Table 4-6 Estimate of the need for affordable home ownership housing, Danbury

Stage and Step in Calculation	Total	Description
STAGE 1: CURRENT NEED		
1.1 Current number of renters in NA	49.94	Census 2011 number of renters x national % increase to 2018
1.2 Percentage renters on housing benefit in LA	18.19%	% of renters in 2018 on housing benefit (based on LA proportion)
1.3 Number of renters on housing benefits in NA	27.27	1.1 x 1.2
1.4 Current need (households)	92.00	Current renters minus those on HB and minus 25% assumed to rent by choice
1.5 Per annum	6.13	1.4/ plan period
STAGE 2: NEWLY ARISING NEED		
2.1 New household formation	337.49	LA household projections for plan period (2014 based) pro-rated to NA
2.2 % of households unable to buy but able to rent	5.33%	Current % of households in PRS
2.3 Total newly arising need	17.99	2.1 x 2.2
2.4 Total newly arising need per annum	1.38	2.3/ plan period
STAGE 3: SUPPLY OF AFFORDABLE HOUSING		
3.1 Supply of affordable housing	24.17	Number of shared ownership homes in NA (Census 2011 + new build to 2018/19)
3.2 Supply - intermediate resales	1.21	3.1 x 5% (assume rate of re-sale)
NET SHORTFALL (OR SURPLUS) PER ANNUM		
Shortfall (per annum)	6.31	Shortfall = (Step 1.5 + Step 2.4) – 3.2

Source: AECOM model, using Census 2011, English Housing Survey 2018, CLG 2014 based household projections and net additions to affordable housing stock. Figures may not sum due to rounding.

85. The total estimated Affordable Housing need over the Plan period 2021-2036 is therefore 51 (rounded) affordable rented homes and 95 (rounded) affordable home ownership dwellings.
86. Affordable housing is typically provided and made financially viable by its inclusion as a proportion of larger market developments, as guided by Local Plan policy, and implemented by the Local Planning Authority. It should be noted that Danbury has an allocation of around 100 homes. Policy DC31 in the adopted Core Strategy and Policy HO1 in the emerging new local plan states that 35% of new housing needs to be affordable. On that basis Danbury can expect to receive 35 affordable homes over the plan period. Clearly this is not sufficient to deliver the 51 houses in most urgent need (nor the additional 95 who may aspire to home ownership but cannot afford to).
87. Therefore, the community may wish to boost the supply of affordable housing in other ways. For example, using community development orders, identifying exception sites or developing community land trusts are all tried and tested ways of boosting the supply of affordable housing above the minima indicated by Local Plan policy.
88. It is important to state there is no policy or legal obligation on the part either of the Local Authority or neighbourhood planners for it to be met in full, either within or outside the Neighbourhood Plan area, though there are tools available to neighbourhood planners, as outlined above, that can help ensure that it is met to a greater extent if resources permit.
89. It is also important to remember that even after the Danbury, or indeed any other, Neighbourhood Plan is adopted, the assessment of need for affordable housing, its allocation to those in need and the management of the housing waiting list all remain the responsibility of the local authority rather than neighbourhood planners.

90. In this sense, it must be acknowledged that neighbourhood plans are by their nature relatively constrained in terms of the extent to which they can meet affordable housing need, unless there is a specific policy on the housing supply-side (e.g. the identification of one or more housing exception sites over and above those required by the Local Plan).

4.6 Tenure Split

91. In terms of the ideal split of tenures within Affordable Housing, it is important to reference Chelmsford's affordable housing policy, as set out in the adopted Local Plan. However, the Local Plan does not state a preferred tenure split.
92. It is then necessary to turn to the SHMA, which calculates the projected need for different tenures in Chelmsford to be 21.3% social and affordable rent and 2.1% shared ownership. This is as a proportion of all housing. As a proportion only of Affordable Housing this equates to a split of approximately 91% social affordable rent and 9% affordable routes to home ownership.
93. In addition to this District-level evidence, it is important to consider is the calculations above. The HNA Affordable Housing need calculations estimated a need for 51 affordable rented units and 95 affordable ownership units over the Plan period. As a proportion of the total of 146 Affordable Housing units this represents, the balance between those figures is 37% to 63%.
94. In order to arrive at a balance between these contrasting pieces of evidence, it is considered appropriate to take an average. The average reflects the more urgent need of those who require affordable rented housing and the wider needs of the District, as well as the more localized evidence which suggests that affordable home ownership products are a useful proposition in Danbury (both because a high potential demand for them has been identified and because there is so little private rented stock).
95. The recommended tenure split for Danbury, based on an average of these two sources, is presented in Table 4-7 below. Each headline tenure category is also broken down into sub-tenures in accordance with the evidence arising from the affordability analysis earlier in this chapter.
96. To justify the sub category tenures we look to Figure 4-4 above, which shows that social and affordable rented dwellings are the only forms of tenure accessible to those on lower quartile incomes (both as single and dual earners). The relatively higher affordability of social rented accommodation justifies a greater focus on this form of tenure. In addition to this Figure 4-4 shows that the only accessible home ownership product is shared ownership (25%) while discounted market homes are largely unaffordable. Therefore, to best address housing need, it is appropriate to favour this form of tenure which is reflected in Table 4-7 below.

Table 4-7: Recommended tenure split (Affordable Housing)

Routes to home ownership, of which	36%
Discounted market sale	10%
Shared ownership	26%
Affordable Housing for rent, of which	64%
Social rent	44%
Affordable rent	20%

Source: AECOM calculations

97. The emphasis on affordable rented housing is further justified by the fact that households needing social/affordable rent have little other choice and have the most urgent housing needs. This group includes homeless households and families living in temporary accommodation. Social/affordable rented housing meets the need of households on the lowest incomes. It is likely to be the priority for affordable housing delivery in Danbury, and the analysis above showed that single-earners on lower quartile incomes can only afford social and affordable rented accommodation.
98. However, our affordability analysis and estimate of the demand for affordable home ownership also point to the role that shared ownership and forms of discounted market housing can play in meeting the needs of those in Danbury who do not require social rented accommodation but are unable to meet the unusually high cost of home ownership. For these reasons, the provision of affordable routes to home ownership should be promoted. Because shared ownership appeared to be the most accessible intermediate tenure in the affordability analysis, it is weighted higher in the above table than other forms of discounted market housing. Note that the precise ownership share to be offered in shared ownership products is not something that it is in the power of neighbourhood planning policies to enforce.

99. While AECOM has made suggestions for the split of different products within the tenure split, though this should be considered indicative as it will be subject to wider considerations of costs, viability and the availability of funding for particular products.
100. Indeed, the precise mix of affordable homes at the site-specific level will be influenced by factors other than the scale of need. The mix will be influenced by viability considerations, the views of Registered Providers including whether they wish to manage small numbers of affordable homes in a rural location, the existing stock mix and other policy objectives. It is important to state that the estimates of need in this HNA or elsewhere do not directly determine affordable housing policies because of these wider policy considerations.
101. The tenure split in Table 4-7 should be considered a guideline for the ideal mix of tenures to be delivered within the NA. As such, it will be a useful point of reference when planning applications are considered but may not represent sufficient justification for the tenure split to be enforced precisely through a Neighbourhood Plan policy.
102. Where the neighbourhood planners wish to craft policy that enforces this split more rigidly, it is important that they liaise with the LPA to gather more detailed income and viability information, and to ensure that departures from the district-level policy context have the LPA's support. Another option is to add caveats to the policy in question, to the effect that the precise mix of affordable housing will be considered on the basis of site-by-size circumstances in addition to this evidence.

4.7 Conclusions- Tenure and Affordability

103. Danbury is characterised by a relatively high proportion of home ownership, as opposed to private and social renting, when compared with Chelmsford and England as a whole. While this could be taken to indicate a housing market where home ownership is within reach of most people, a more detailed analysis of affordability reveals that this is not the case.
104. In the Danbury Survey, 95% of responses approve of the housing development vision, which states as a priority to provide suitable housing at less than the market value, indicating that most people agree market housing is widely unaffordable for the local population.
105. Indeed, the annual income required for an entry-level home (in terms of mortgage availability, and not including the cost of the necessary deposit) is double the average net household income in Danbury and just over three quarters the lower quartile gross income of a single-earner.
106. Private renting is comparatively uncommon in Danbury, despite rising significantly between 2001 and 2011 (as did shared ownership, from a low base). At the same time, the number of properties available for social rent declined by 6% as occupiers of such accommodation made purchases through the Right to Buy program.
107. Given that social and affordable rent are the only secure tenures within reach of dual-earning households on lower quartile incomes (though some may access private rented dwellings through housing benefit), a lack of social or affordable rented dwellings is the principle affordability challenge for Danbury residents.
108. To ensure that other households on lower than average incomes can afford to continue living in Danbury and that the high number of overcrowded households¹⁶ can have the opportunity to form their own independent households, it will also be important to increase the quantity of affordable routes to home ownership¹⁷ – especially if reforms to welfare including housing benefit are implemented in the coming years. That said, it appears that only shared ownership at a 25% share is affordable to most people.
109. Affordable Housing is typically provided and made financially viable by Borough-wide planning policies that require it to be included at a set proportion of larger market housing developments. This policy expectation in Danbury, expressed in the adopted Core Strategy and emerging Local Plan is that 35% of new housing on developments providing 11 dwellings or more will be affordable.
110. Of the indicative figure of around 100 dwellings proposed for Danbury 35 dwellings are likely to be affordable on the basis of that policy requirement. This figure is lower than the 51 households that are projected to be in need of Affordable Housing to rent over the same period and the 95 households projected to be in need of Affordable Housing for sale. If the majority of new housing is delivered through infill development (on small sites dispersed around the

¹⁶ See glossary, page 55 for definition.

¹⁷ Such as shared ownership and discounted market sales housing.

NA), many of these sites will not meet the requirement of providing 11 or more dwellings and so the number of Affordable Housing units will be lower still.

111. Since the level of expected delivery is not sufficient to meet local need as evidenced in this HNA, it is critical that the 35% delivery requirement is met wherever possible in Danbury. Should the community wish to further boost the supply of Affordable Housing there are other routes available to providing it. For example, using community development orders, identifying exception sites (explicitly supported by the emerging Local Plan Policy HO2) or developing community land trusts are all tried and tested ways of increasing the supply of affordable housing above the minima indicated by Local Plan policy.
112. It is difficult to exceed the Local Plan affordable housing policy requirement in the neighbourhood plan because such steps are rarely accepted by planning inspectors on the grounds that an extremely high standard of justification is required which goes beyond the scope of a HNA, in particular around the issue of what level of Affordable Housing delivery can be financially viable in the NA. Raising the percentage of Affordable Housing required could, furthermore, have the effect of discouraging new building from coming forward altogether. Should the group wish to consider such an option, it is advisable to discuss this with the LPA in the first instance.
113. Of the 35% Affordable Housing units to be delivered in Danbury, it is recommended that approximately 64% be offered as social or affordable rent, with the emphasis on social rent and the remaining 36% delivered as affordable routes to home ownership, with the emphasis on shared ownership as opposed to discounted market housing (which is not affordable in this area).
114. However, it should be noted that in the Danbury Survey, when asked their preferred means of obtaining a new home, 98% selected home ownership and 75% selected shared ownership. Council housing and private rented/ social rented were considered unsuitable. This does not mean these tenures should not be provided at all. It does, however, point to a need to further assess demand for this product when planning for new development. This should not however, outweigh the demonstrated need for this tenure.
115. The need to improve affordability in Danbury across all tenures aligns with the findings in relation to the type and size of homes – that new residential development should ensure a substantial proportion of smaller dwellings. Increasing the proportion of smaller homes and more affordable types (as above) should help to rebalance the housing stock in favour of options that are both suitable to the population profile as it evolves over time and that will combat growing affordability challenges.

5. RQ 2: Type and Size

RQ 2: What type (terrace, semi, bungalows, flats and detached) and size (number of bedrooms) of housing is appropriate for Danbury over the Neighbourhood Plan period?

5.1 Introduction

117. The Danbury Neighbourhood Plan will need to include policies informed by robust data on what sizes and types of housing would be best suited to the local community. This will help ensure that future developments give local people at all stages of life the options they require, while keeping the market operating efficiently.
118. PPG recommends a consideration of the existing housing provision and its suitability, having regard to demographic shifts in age and household composition, to address future, as well as current community need. For this reason, we firstly consider the type and size of the existing housing stock in the Danbury area (NA). Demographic shifts in age and household composition will then be considered. Finally, the future demand for housing by size and type will be determined by the way different household types currently occupy their dwellings in the LPA, and then applying to that baseline assessment demographic projections of how the Danbury population is likely to change by the end of the Plan period.

5.2 Existing types and sizes

5.2.1 Background and definitions

119. Before beginning our consideration of dwelling type and size, it is important to understand how different types of households occupy their homes. Crucially, and unsurprisingly, household ‘consumption’ of housing (in terms of housing size) tends to increase alongside wages, with the highest earning households consuming relatively more (i.e. larger) housing than those on lower incomes. Similarly, housing consumption tends to increase, alongside wealth, income, and age, such that older households tend to have larger homes than younger households, often as a result of cost and affordability.
120. In this context, even smaller households (those with fewer than three inhabitants) may be able to choose to live in larger homes than they require, and thus would be defined in Census terms as under-occupying their homes. This is a natural feature of the housing market, and can distort considerations of future housing needs, with market dynamics and signals giving a very different picture than demographics, household type and size would suggest for future years.
121. In order to understand the terminology surrounding dwelling size analysis, it is important to note that the number of rooms recorded in Census data excludes some rooms such as bathrooms, toilets and halls. Dwelling size data is collected by determining the number of rooms being occupied by each household. In the section that follows, ‘dwelling sizes’ should thus be translated as follows:¹⁸
- 1 room = bedsit
 - 2 rooms = flat/house with one bedroom and a reception room/kitchen
 - 3 rooms = flat/house 1-2 bedrooms and one reception room and/or kitchen
 - 4 rooms = flat/house with 2 bedroom, one reception room and one kitchen
 - 5 rooms = flat/house with 3 bedrooms, one reception room and one kitchen
 - 6 rooms = house with 3 bedrooms and 2 reception rooms and a kitchen, or 4 bedrooms and one reception room and a kitchen
 - 7+ rooms = house with 4 or more bedrooms
122. It is also useful to clarify the Census terminology around dwellings and household spaces. These can be confusing where different terminologies such as flats, apartments, shared and communal dwellings, and houses in multiple occupation, are used. Dwellings are counted in the Census by combining address information with Census returns on whether people’s accommodation is self-contained.¹⁹ As such, all dwellings are classified into either “shared” or “unshared” dwellings. Household spaces make up the individual accommodation units forming part of a shared dwelling.
123. The key measure of whether a dwelling is shared or unshared relates to the Census’ definition of a household. A

¹⁸ At <https://www.nomisweb.co.uk/census/2011/qs407ew>

¹⁹ At <https://www.gov.uk/guidance/dwelling-stock-data-notes-and-definitions-includes-hfr-full-guidance-notes-and-returns-form>

household is defined as “One person living alone or a group of people (not necessarily related) living at the same address who share cooking facilities and share a living room or sitting room or dining area.”²⁰ On this basis, where unrelated *residents* of a dwelling share rooms other than a kitchen, this would be considered a single household in an unshared dwelling, whilst where only a kitchen is shared, each resident would be considered their own household, and the dwelling would be considered shared.

5.2.2 Dwelling type

124. The 2011 Census shows that the NA is characterised by a particularly large proportion of detached dwellings compared to wider geographies, with a correspondingly lower proportion of semi-detached and terraced houses and a particularly low proportion of flats, maisonettes or apartments (see Table 5-1 below).

Table 5-1: Accommodation type (households), Danbury 2011

Dwelling type		Danbury	Chelmsford	England
Whole house or bungalow	Detached	63.1%	29.8%	22.4%
	Semi-detached	19.8%	31.4%	31.2%
	Terraced	11.3%	20.5%	24.5%
Flat, maisonette or apartment	Purpose-built block of flats or tenement	4.5%	15.9%	16.4%
	Parts of a converted or shared house	0.2%	1.1%	3.8%
	In commercial building	0.7%	0.7%	1.0%

Source: ONS 2011, AECOM Calculations

5.2.3 Bungalows

125. The Danbury Survey demonstrated a strong level of demand for bungalows, with 86% of responses considering them net suitable, making them the second most popular category behind semi-detached houses for which 92% of responses deemed net suitable.

126. As the ONS Census data does not capture bungalows as a distinct type, we have used Valuation Office Agency data to investigate their presence in Danbury. This data is limited in the sense that all the statistics are rounded to the nearest 10, and because it is only available down to the level of the Middle Super Output Area (MSOA) used in the Census, so the data discussed below covers a slightly wider area than the Danbury NA. The code for the MSOA in question is E02004500, and the map in Figure 5-1 below shows its boundary.

²⁰ Ibid.

Figure 5-1: MSOA E02004500, used as a best-fit geographical proxy for the Neighbourhood Plan area



Source: ONS

127. The data is presented in Table 5-2 below. It shows that 15% of properties in Danbury are bungalows, a higher rate to that seen across Chelmsford as a whole, England and Wales. On the basis of comparison with these wider geographies it is not the case that Danbury has an undersupply of bungalows. However, further analysis in this and subsequent chapters may show if demand is expected to rise beyond the current level of provision.

Table 5-2: Number of bungalows by property size, 2019

	Danbury	Chelmsford	England and Wales
1 bedroom	60	1,070	280,050
2 bedrooms	210	3,210	1,200,960
3 bedrooms	220	1,780	794,840
4 bedrooms +	90	490	160,990
Unknown	0	10	7,320
Total	580	6,550	2,444,150
Percentage of all properties that are bungalows	15% (of 3,840)	9% (of 75,120)	10% (of 25,635,730)

Source: Valuation Office Agency, Council tax: stock of properties, 2019, Table CTSOP3.1_2018

5.2.4 Dwelling size

128. Table 5-3 below sets out the proportion of dwellings having various numbers of rooms. The housing stock in the NA is characterised by a notably larger share of homes with 7 rooms or more than seen at Borough level – a combined 55% compared with 21% in Chelmsford. There are consequently proportionally fewer smaller homes in Danbury.

Table 5-3: Number of rooms per household in the plan area, 2011

Number of Rooms	Danbury	Chelmsford
1 Room	0.1%	0.4%
2 Rooms	0.1%	2.4%
3 Rooms	4.8%	9.2%
4 Rooms	8.6%	15.3%
5 Rooms	15.6%	21.6%
6 Rooms	15.3%	20.1%
7 Rooms	17.6%	13.1%
8 Rooms or more	17.3%	8.9%
9 Rooms or more	20.4%	8.9%

Source: ONS 2011, AECOM Calculations

129. It is also relevant to consider how the number of rooms occupied by households changed between the 2001 and 2011 Censuses. The main change from the 2001 Census findings is that the plan area has undergone significant growth in the largest dwelling category, with only moderately lower growth than seen at district level in the 8 room categories in line with the national trend of building larger executive new homes.
130. Unusually, there has been a decline in the number of properties with 2 to 7 rooms in Danbury, which could be due to the replacement or extension of existing buildings.

Table 5-4: Rates of change in number of rooms per household, 2001-2011

Number of Rooms	Danbury	Chelmsford	England
1 Room	0.0%	-19.1%	-5.2%
2 Rooms	-70.0%	36.7%	24.2%
3 Rooms	-4.9%	20.8%	20.4%
4 Rooms	-9.3%	5.7%	3.5%
5 Rooms	-9.4%	-6.5%	-1.8%
6 Rooms	-4.9%	0.0%	2.1%
7 Rooms	-2.7%	15.6%	17.9%
8 Rooms or more	18.9%	29.8%	29.8%

Source: ONS 2001-2011, AECOM Calculations

131. Returning to the most recent Census data, it is also useful to compare the figures for number of rooms with figures for the number of bedrooms for each household. Table 5-5 below summarises the proportion of households occupying each size of home in terms of the number of bedrooms. This data shows that the NA is roughly in line with higher level geographies for all categories, but again contains a lower proportion of smaller properties and a higher proportion of larger properties. This imbalance in the existing housing stock towards large homes is alone sufficient evidence for the Danbury to promote the delivery of smaller homes in future. The ideal proportion of dwelling sizes for future development is explored at the end of this chapter.

Table 5-5: Number of bedrooms in household spaces in Danbury, 2011

Bedrooms	Danbury		Chelmsford		England	
	Count	Percentage	Count	Percentage	Count	Percentage
All categories: no. of bedrooms	2,036	100.0%	69,667	100.0%	22,063,368	100.0%
No bedrooms	6	0.3%	138	0.2%	54,938	0.2%
1 bedroom	97	4.8%	7,366	10.6%	2,593,893	11.8%
2 bedrooms	300	14.7%	15,429	22.1%	6,145,083	27.9%
3 bedrooms	661	32.5%	28,303	40.6%	9,088,213	41.2%
4 bedrooms	762	37.4%	14,556	20.9%	3,166,531	14.4%
5 or more bedrooms	210	10.3%	3,875	5.6%	1,014,710	4.6%

Source: ONS 2011, AECOM Calculations

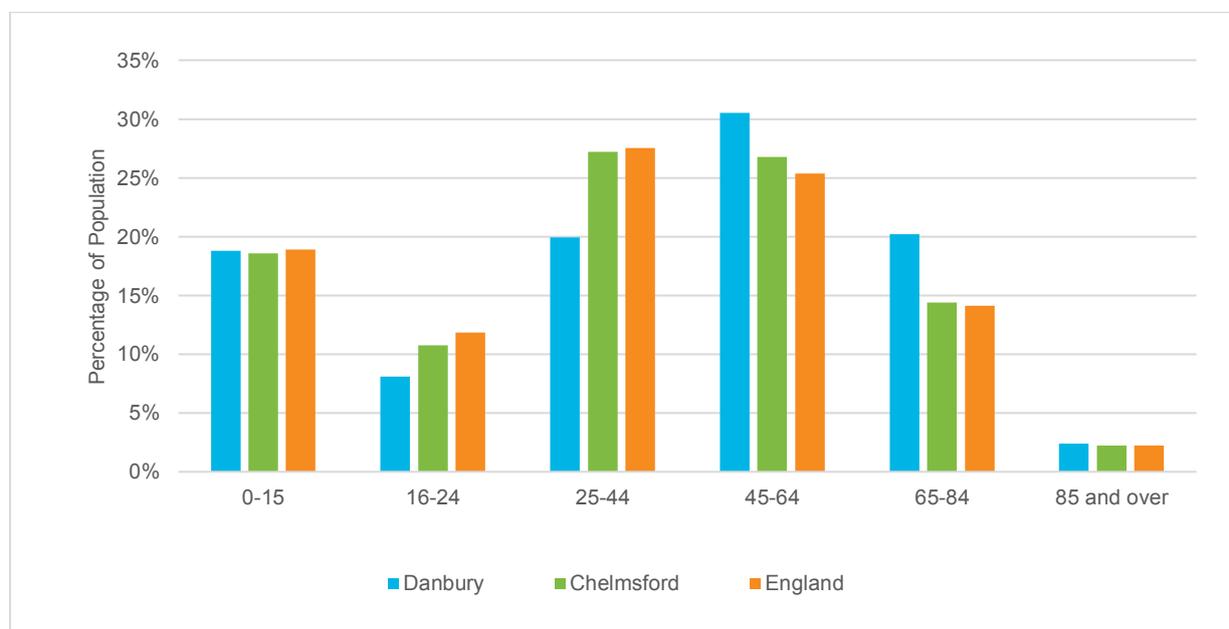
5.3 Household composition and age structure

132. The current stock profile of Danbury has now been established, with recent changes in its composition identified. The evidence assembled below relates to the composition and age structure of households both in the 2011 Census and in future years. Through a consideration of the types of households projected to form over the Neighbourhood Plan period, and the mix of age groups suggested by demographic projections, it becomes possible to consider the size of housing needed in the NA by the end of the Plan period.

5.3.1 Age structure

133. The 2011 Census data presented in Figure 5-2 below reveals that the plan area has a much higher proportion of people in the 45-64 and 65-84 age categories than seen at the Borough or national level. Given this weighting towards an older population, over the Plan period to 2034, it is likely that Danbury will require smaller dwellings better suited to couples and single persons, running contrary to recent building patterns.

Figure 5-2: Age structure, 2011



Source: ONS 2011, AECOM Calculations

134. In terms of changes to age structure over time, Census data shows that since 2001 the Danbury population has grown notably for both categories of 65 and above, while the 0-15 and 25-44 age groups have declined. In addition to a moderately ageing population, a further demographic challenge for Danbury is the lack of growth in those of childbearing

age and consequently the younger replacement population. These patterns are similar to those seen at borough level, but are slightly more pronounced (see Table 5-6 below).

Table 5-6: Rate of change in the age structure of the population, 2001-2011

Age group	Danbury	Chelmsford	England
0-15	-3.3%	-0.1%	1.2%
16-24	3.8%	8.7%	17.2%
25-44	-13.5%	-1.6%	1.4%
45-64	1.3%	14.0%	15.2%
65-84	30.5%	19.6%	9.1%
85 and over	10.8%	39.0%	23.7%

Source: ONS 2001-2011, AECOM Calculations

5.3.2 Household composition

135. Household composition (i.e. the mix of adults and children in a dwelling) is another relevant factor in driving the size (and to an extent, the type) of housing needed over the Plan period.
136. In assessing Census data on household composition in Table 5-7 below, we see that Danbury is fairly consistent with the Borough for all household composition, with only a slightly higher proportion of one family households.
137. Note that non-dependent children refers to children who are adults but live at home with their parents or keep that address while at university.

Table 5-7: Household composition (by household), 2011

Household composition		Danbury	Chelmsford	England
One person household	Total	20.6%	27.5%	30.2%
	Aged 65 and over	11.8%	11.5%	12.4%
	Other	8.8%	16.0%	17.9%
One family only	Total	74.6%	67.2%	61.8%
	All aged 65 and over	15.6%	9.4%	8.1%
	With no children	20.2%	19.6%	17.6%
	With dependent children	27.7%	27.7%	26.5%
	All children Non-Dependent	11.1%	10.4%	9.6%
Other household types	Total	4.8%	5.4%	8.0%

Source: ONS 2011, AECOM Calculations

138. Again, it is relevant to consider rates of change in this indicator during the period between Censuses. As shown in Table 5-8 below, between 2001 and 2011 the biggest change was the increase in one family households all aged over 65, indicative of an ageing population with a comparatively lower base population of those aged over 65. There were however decreases in the one-person household category within the NA for those aged 65 and over, as well as in one family households with no children and dependent children in contrast to increases at district level. On the other hand, the number of households with non-dependent children increased, but not as much as district and national levels.
139. Note that 'other household types' refer generally to households composed of multiple families or individuals, such as students or others sharing a single dwelling.

Table 5-8: Rates of change in household composition, 2001-2011

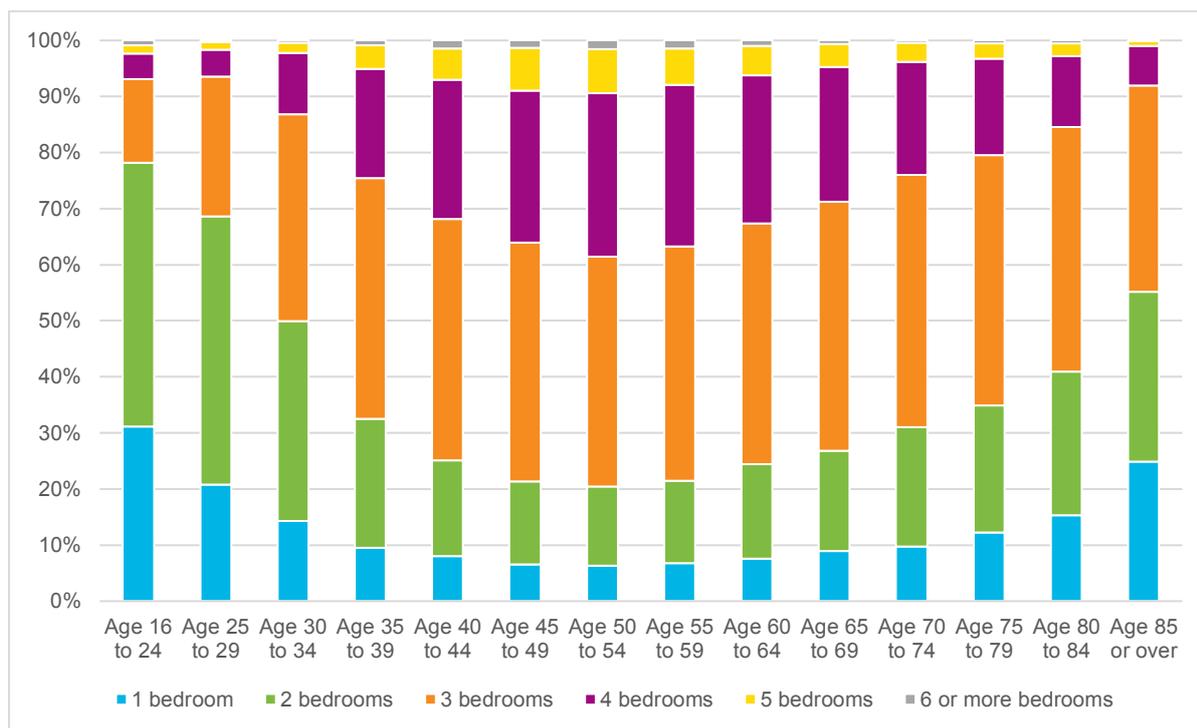
Household type		Percentage change, 2001-2011		
		Danbury	Chelmsford	England
One person household	Total	0.0%	8.4%	8.4%
	Aged 65 and over	-7.7%	-0.9%	-7.3%
	Other	12.6%	16.1%	22.7%
One family only	Total	0.3%	6.7%	5.4%
	All aged 65 and over	24.2%	6.0%	-2.0%
	With no children	-9.1%	5.8%	7.1%
	With dependent children	-5.8%	4.7%	5.0%
	All children non-dependent	8.7%	14.8%	10.6%
Other household types	Total	54.0%	23.4%	28.9%

Source: ONS 2001-2011, AECOM Calculations

5.4 Dwelling mix determined by life-stage modelling

140. Recognising the fact that households of different ages have different housing needs, to estimate the housing mix needed by the end of the Plan period we adopt an approach based on the reasonable assumption that current occupation patterns – that is, the propensity of households of different ages to occupy different types of accommodation – will persist into the future. For example, projected growth in households aged under 24 will lead to an increase in the need for the type of housing currently occupied by households of that age.
141. However, no data on housing size occupation by age of the Household Reference Person (HRP- a more modern term for 'head of household') is available at neighbourhood level. For this reason, Borough-level data needs to be used as the closest proxy.
142. Figure 5-3 below sets out the relationship in the 2011 Census in Chelmsford between the age of the HRP and the size of dwelling occupied. This provides the starting point for determining the most appropriate dwelling size mix by the end of the Plan period. The data shows that whilst the majority of Chelmsford residents live in 1- and 2- bedroom properties until the age of 30, the preference turns to dwellings of 3 bedrooms or more right up until the age of 85, when the preference for smaller homes again exceeds 50% of households. The preference for 4-bedroom dwellings follows the trend of 3- bedroom dwellings, while the preference for 1- bedroom homes fluctuates at a low level for almost all life stages, likely due to the short supply of 1- bedroom flats across the Borough.

Figure 5-3: Age of household reference person by dwelling size in Chelmsford, 2011



Source: ONS 2011, AECOM Calculations

143. Next, household projections provided by MHCLG are consulted to achieve an understanding of the future distribution of households by the age of the HRP. Again, this data is only available at the Borough level and for the years 2011 to 2039. Therefore, the distribution of households by the age of the HRP in 2034, i.e. the end of the Neighbourhood Plan period, is estimated and coloured red in Table 5-9 below.

Table 5-9: Projected distribution of households by age of HRP, Chelmsford

Year	Age of HRP 24 and under	Age of HRP 25 to 34	Age of HRP 35 to 54	Age of HRP 55 to 64	Age of HRP 65 and over
2011	1,552	9,160	28,136	12,524	18,295
2014	1,676	9,700	27,670	11,670	20,950
2036	1,688	9,304	30,354	13,404	31,096
2039	1,690	9,250	30,720	13,640	32,480

Source(s): MHCLG 2014-based household projections, ONS 2011, AECOM Calculations

144. At this point, it is then necessary to extrapolate from these Borough-level population projections an estimate of the corresponding change in the age structure of the population in Danbury. To do so, the percentage of increase expected for each group across Chelmsford between 2001 and 2036, derived from the data presented above, is mapped to the population of Danbury. The results of this calculation are detailed in Table 5-10 below. It is notable that while all age groups over 35 are expected to increase in size over the Plan period, those aged 65 and over will nearly double (to nearly 46% of the entire population). The distribution of HRPs under 34 is set to stay at a relatively even level.

Table 5-10: Projected distribution of households by age of HRP, Danbury

Year	Age of HRP 24 and under	Age of HRP 25 to 34	Age of HRP 35 to 54	Age of HRP 55 to 64	Age of HRP 65 and over
% change 2011-2034 for Chelmsford	16	111	781	419	709
Danbury 2011 population	17	118	768	390	812
Danbury 2036 projection	17	113	843	448	1,205

Source: AECOM Calculations

145. Then, to complement the two stages above, Table 5-11 below sets out the distribution of dwellings of different sizes according to the age of the HRP as they appeared in Chelmsford at the time of the Census 2011. This provides the basis for a modelled estimate of the proportion of dwelling sizes that will be occupied by each age band across Danbury by the end of the plan period.

Table 5-11: Age of household reference person to size, grouped, Chelmsford, Census 2011

Size	Age of HRP 16 to 24	Age of HRP 25 to 34	Age of HRP 35 to 54	Age of HRP 55 to 64	Age of HRP 65 and over
1 bedroom	31.2%	17.1%	7.6%	7.2%	13.3%
2 bedrooms	47.0%	40.8%	17.1%	15.8%	22.8%
3 bedrooms	15.0%	31.8%	42.4%	42.4%	43.3%
4 bedrooms	4.5%	8.3%	25.3%	27.6%	17.3%
5+ bedrooms	2.4%	2.0%	7.7%	7.1%	3.3%

Source(s): MHCLG 2014-based household projections, ONS 2011, AECOM Calculations

146. Finally, having established the preference shown by households at different life-stages towards dwellings of different sizes, and the approximate number of households in Chelmsford and Danbury falling into each of these stages by the end of the Plan period in 2036, it is now possible to recommend how the housing stock could evolve in terms of size over the Neighbourhood Plan period to overcome existing or future misalignments between the supply of dwellings and demand (see Table 5-12 below).
147. The table takes in turn each projected age group in 2036, estimating how many of the households in that age bracket will want or need to occupy each size of dwelling. By doing so for each age bracket and then adding together the totals for each dwelling size, we arrive at an estimation of what proportion of each size of dwelling will be required overall. By multiplying a number of households by the percentages in Table 5-11 above, the results are rarely whole numbers and are therefore presented as rounded. Because the totals are derived from the exact (non-rounded) data, not all columns and rows will sum precisely.

Table 5-12: Ideal dwelling size distribution in Danbury by the end of the Plan period, based on modelled household life-stages

Size	Age of HRP 16 to 24	Age of HRP under 35	Age of HRP 35 to 54	Age of HRP 55 to 64	Age of HRP 65 and over	Total households requiring dwelling sizes
Households 2036	17	113	843	448	1,205	-
1 bedroom	5	19	64	32	160	281
2 bedrooms	8	46	144	71	275	544
3 bedrooms	3	36	357	190	522	1,107
4 bedrooms	1	9	213	124	208	555
5+ bedrooms	0	2	65	32	40	139

Source: Census 2011, AECOM Calculations

148. It is now possible to compare the 2011 housing mix in terms of size with the projected requirement based on the estimates set out in Table 5-12 above, which are produced by modelling the change in the age structure of the population in Danbury.
149. Table 5-13 below indicates that, by 2036, the size distribution of dwellings should shift towards the smaller end of the size spectrum, with lower proportions of dwellings with 4 or more bedrooms and higher proportions of smaller homes.
150. It is important to note, when comparing the current and recommended size mix, the fact that Danbury currently has an unusually large stock of housing – i.e. it contains higher proportions of larger homes and lower proportions of smaller ones than the wider district. It is therefore likely that any estimate of future demand based on the occupation patterns of different age groups will contrast with what is a relatively unusual baseline housing mix.

Table 5-13: 2011 housing sizes compared to ideal distribution at end of Plan period, Danbury

Number of bedrooms	2011		2036	
1 bedroom	97	4.8%	281	10.7%
2 bedrooms	300	14.7%	544	20.7%
3 bedrooms	661	32.5%	1,107	42.2%
4 bedrooms	762	37.4%	555	21.1%
5 or more bedrooms	210	10.3%	139	5.3%
Total households	2,036	100.0%	2,626	100.0%

Source: Census 2011, AECOM Calculations

151. Table 5-14 below sets out the estimated misalignment between future demand for housing, based on the modelled preferences of households at different life-stages, and the current stock available in the Neighbourhood Plan area.

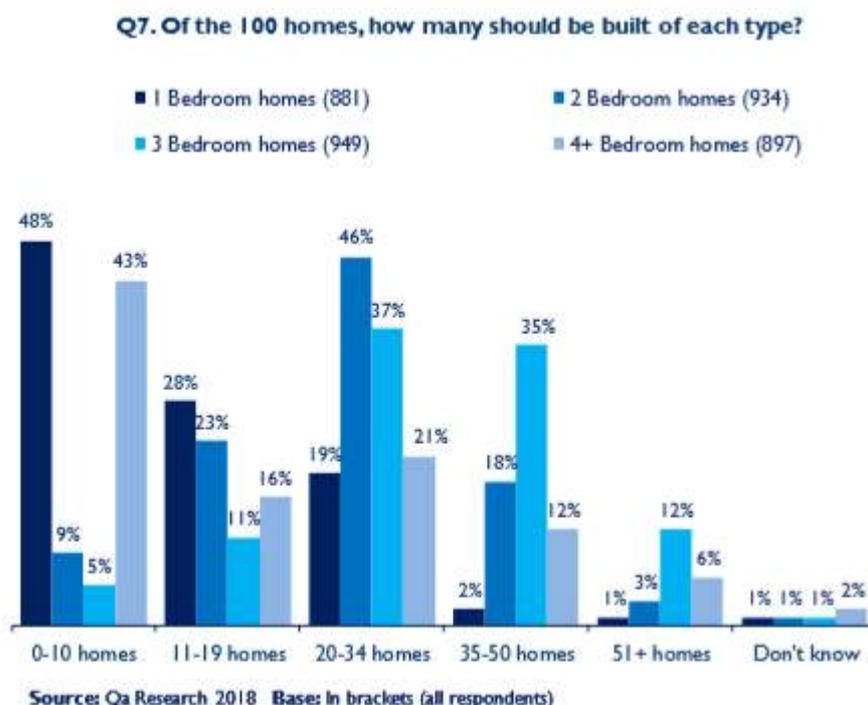
Table 5-14: Future potential misalignments of supply and demand for housing, Danbury

Number of bedrooms	2011	2034	Change to housing mix	Recommended split
1 bedroom	97	281	184	21.0%
2 bedrooms	300	544	244	27.9%
3 bedrooms	661	1,107	446	51.1%
4 bedrooms	762	555	-207	0.0%
5 or more bedrooms	210	139	-71	0.0%

Source: AECOM Calculations

152. Note that the changes to the housing mix given above for 4- and 5-bedroom dwellings are negative numbers. Because in light of the national and local housing shortage, it is rarely advisable or practicable to remove dwellings from the available stock, as would otherwise be suggested here for dwellings with four or more bedrooms, we have instead set the recommended split at 0% rather than a negative number, and rebalanced the other sizes as percentages of the additional dwellings they represent in total.
153. The interim result of the life-stage modelling exercise is that to minimise misalignments between supply and demand, 21% of dwellings in new developments should have 1 bedroom, 27.9% should have two bedrooms, 51.1% should have three bedrooms, and no further dwellings with 4 or more bedrooms are needed. This differs somewhat from the housing mix suggested in the CCC draft plan. However, it more accurately addresses the needs of the neighbourhood area as it only takes into account the housing stock in Danbury rather than the wider local authority area.
154. Efforts to change the dwelling mix in this smaller direction would help to allow a growing older cohort of households to rightsize within their existing community if they wish to, and younger people to be able to move into suitably sized first homes, while leaving enough of the larger existing homes to meet demand from families and the still-prominent 35 to 45 age group.
155. However, this recommendation should be applied with a degree of flexibility because it may not be reasonable in practice strictly to limit the provision of dwellings with four or more bedrooms, and in fact, such a restriction has the potential to negatively impact the viability of sites that could help to deliver Affordable Housing or other community priorities. It should also be noted that this report is concerned with demand in the sense of need rather than in the sense of the preferences of potential occupants, which will likely include demand for larger homes. There may also be good reasons to deliver larger properties in the NA as part of a housing mix strategy in the Borough as a whole.
156. Respondents to the Danbury Survey indicated a broadly similar preference for 2- and 3- bedroom homes to the above result. However, demand from Survey respondents is far lower than the above result for 1- bedroom homes, and there is greater demand for 4-bedroom homes than the model suggests. This is a further reason for flexibility in planning for the size mix of new homes, and may justify a reduction in the proportion of 1 bedroom homes that should be planned for. The results of this element of the Survey are reproduced in Figure 5-4 below.

Figure 5-4: Preference for dwelling sizes, Danbury Survey



Source: Danbury Survey

The SHMA puts forward a dwelling size mix only by tenure rather than for all housing, but can still be usefully compared to the above result. For owner-occupied housing, which can be assumed to most closely align with the all housing as considered above, 2- and 3-bedroom homes are projected to be in greatest need, in broadly similar

proportions to Danbury, although the need for 1-bedroom homes is lower and that for 4+ bedroom homes higher. This is likely a function of the existing stock profile of Chelmsford, which is more dominated by large homes, as was demonstrated in the analysis at the start of this chapter.

Table 5-15: Dwelling size mix in 2037, Chelmsford

Table 4.4b Size of new owner-occupied accommodation required in Chelmsford over the next 22 years				
<i>Dwelling size</i>	<i>Current size profile</i>	<i>Size profile 2037</i>	<i>Change required</i>	<i>% of change required</i>
One bedroom	2,117	2,829	712	8.2%
Two bedrooms	8,457	11,051	2,594	29.8%
Three bedrooms	22,266	26,247	3,981	45.8%
Four or more bedrooms	18,655	20,065	1,411	16.2%
Total	51,495	60,192	8,698	100.0%

Source: Braintree, Chelmsford, Colchester & Tendring Councils 2015 Strategic Housing Market Assessment

Source: Baintree, Chelmsford, Colchester and Tandrige SHMA (2015)

5.5 Conclusions- Type and Size

157. Danbury's stock of existing housing is characterized by significantly higher proportions of detached houses and homes with 7 or more rooms than Chelmsford or England. Large properties also experienced the greatest level of growth between 2001 and 2011 among all home sizes.
158. Bungalows represent a higher proportion of all housing in Danbury compared to the situation across Chelmsford as a whole, and national wide housing stock (15% of all homes in Danbury, compared with 9% in Chelmsford and 10% nationally).
159. The age profile of the Danbury population is broadly similar to that of the wider Borough, except for a substantially higher share of the population aged 45-84 – a group that is likely to reach retirement age over the Plan period to 2034 and will become the largest source of demand for housing, whether they intend to occupy the same dwellings they currently live in, or perhaps move within the community to a home better suited to the size of their household or their evolving needs.
160. It will therefore be important that new development prioritise housing that is appropriate both to families with children and older households. The needs and financial capabilities of both these groups do overlap to some extent, although the precise configuration and quality expectations that they have for smaller dwellings may vary. In the context of Danbury's unusual stock of large housing, an appropriate response would be to prioritise the supply of smaller or mid-sized dwellings.
161. The results of a life-stage modelling exercise, which looks at the sizes of dwelling occupied by different age groups and projects the growth and decline of those age groups over the Plan period in order to understand what should be built, corroborates this finding. The recommended size mix of new housing focuses on dwellings of 1 to 3 bedrooms, and suggests that no further large dwellings are needed.
162. This model, however, operates on the assumption that households can and will wish to move freely around the stock of existing housing, which is not a realistic prospect. It is natural, then, that demand should continue for some larger dwellings. The provision of larger homes should not be inhibited entirely (though some of that demand will be met by natural churn within the market), but to the extent that the community wish to influence the size mix of housing coming forward, smaller homes should be the priority.
163. That said, respondents to the Danbury Survey indicated a broadly similar preference for 2- and 3-bedroom homes to the result of the modelling exercise and the indicative housing mix set out in the CCC draft Plan. This is a further reason for flexibility in planning for the size mix of new homes, and may justify a reduction in the proportion of 1-bedroom homes that should be planned for.

164. In the Tenure and Affordability chapter analysis, it was found that market housing for sale (as opposed to market housing for rent and all types of Affordable Housing) is increasingly unaffordable and that those on the lowest incomes are unable to afford to live outside of the affordable rented sector. While Affordable Housing should be well balanced in terms of size to cater for all circumstances, the provision of smaller homes for sale and rent, as advised here, should make an important contribution to improving affordability more widely. If older households wishing to rightsize and younger ones seeking to form their own independent households are to be able to afford to live in Danbury, increasing the provision of small and mid-size homes and, in so doing, rebalancing the housing stock away from very large housing, will be key.
165. In terms of the types of dwellings required, the current predominance of detached dwellings, compared with District and national trends, suggests that there may be some unmet demand for the rarer and generally more affordable dwelling types, such as terraced homes and particularly apartments. The size recommendation for smaller homes would align with this, this would also broadly align with the survey results (shown in Figure 5-4). This might also include the delivery of bungalows in order to meet the needs of some older households and to reflect the fact that other smaller dwelling types, such as apartments, may not in practice be popular market propositions in a rural area like Danbury.
166. Bungalows do not appear to be undersupplied in comparison to the District and national trend, but they were close behind houses overall as the preferred type of dwelling among respondents to the Danbury Survey. The analysis of an ageing population suggests that a relatively high proportion of households can be expected to experience some form of mobility limitation by the end of the Plan period. To the extent that bungalows hold wide appeal among the existing population and can also be expected to meet the needs of many individuals whose mobility is limited a lot, they should be promoted in new housing where possible.

6. Conclusions

6.1 Overview

167. Table 6-1 below sets out in full the conclusions and recommendations of this Neighbourhood Plan housing needs assessment, based on the evidence reviewed and analysed.

Table 6-1: Summary of findings

Issue	Summary of evidence and data assessed	Conclusions and recommendations
<p>Housing tenure and affordability</p>	<p>Danbury is characterised by a relatively high proportion of home ownership, as opposed to private and social renting, when compared with Chelmsford and England as a whole.</p> <p>In the Danbury Survey, 95% of responses approve of the housing development vision, which incorporates the priority to provide suitable housing at less than the market value indicating that most people agree market valued housing is widely unaffordable for the local population.</p> <p>The annual income required for an entry-level home (in terms of mortgage availability, and not including the cost of the necessary deposit) is double than the average net household income locally and just over three quarters the lower quartile gross income of a single-earner</p> <p>The rate of shared ownership and private rented in Danbury rose significantly between 2001 and 2011, while the number of properties available for social rent declined by 6% as occupiers of such accommodation made purchases through the Right to Buy programme. However, even given this significant increase in the private rented sector and shared ownership, these two tenures hold the lowest share of the housing stock.</p> <p>When asked about their preferred means of obtaining a new home, the vast majority of responses favoured home ownership and shared ownership. While private, council and social rented dwellings were considered unsuitable.</p>	<p>Given that social and affordable rent are the only secure tenure within reach of dual-earning households on lower quartile incomes (though some may access private rented dwellings through housing benefit) the lack of social or affordable rented dwellings is the principle affordability challenge for Danbury residents.</p> <p>To ensure that other households on lower than average incomes can afford to continue living in Danbury and that the high number of overcrowded households can have the opportunity to form their own independent households, it will also be important to increase the quantity of affordable routes to home ownership.</p> <p>Of the indicative figure of 100 dwellings proposed for Danbury 35 dwellings are likely to be affordable on the basis of that policy requirement. This figure is lower than the 51 households that are projected to be in need of Affordable Housing to rent over the same period and the 95 households projected to be in need of Affordable Housing for sale. If the majority of new housing is delivered through infill development on small sites dispersed around the NA, many of these sites will not meet the requirement of providing 11 or more dwellings and so the number of Affordable Housing units will be lower still.</p> <p>Since the level of expected delivery is not sufficient to meet local need as evidenced in this HNA. It is critical that the 35% delivery requirement is met wherever possible in Danbury.</p> <p>Should the community wish to further boost the supply of Affordable Housing there are other routes available to providing it. For example, using community development orders, identifying exception sites (explicitly supported by the emerging Local Plan Policy HO2) or developing community land trusts are all tried and tested ways of increasing the supply of affordable housing above the minima indicated by Local Plan policy.</p> <p>Of the 35% Affordable Housing units to be delivered in Danbury, it is recommended that approximately 64% be offered as social or affordable rent, with the emphasis on social rent and the remaining 36% delivered as affordable routes to home ownership, with the emphasis on shared ownership as opposed to discounted market homes (which are not affordable in this area).</p>

<p>Housing type and size</p>	<p>Danbury's stock of existing housing is characterised by significantly higher proportions of detached houses and homes with 7 or more rooms than Chelmsford or England. The supply of larger properties increased at the highest rate between 2001 and 2011.</p> <p>Bungalows form a higher proportion of all housing to the situation across Chelmsford and a higher proportion than across England.</p> <p>The age profile of the Danbury population is broadly similar to that of the wider Borough, except for a substantially higher share of the population aged 45-84.</p>	<p>New development should prioritise housing that is appropriate to young people, families with children and older households. In the context of Danbury's unusual stock of large housing, an appropriate response would be to prioritise the supply of smaller or mid-sized dwellings.</p> <p>The recommended size mix of new housing (including replacement dwellings) focuses on dwellings of 1 to 3 bedrooms, and suggests that no further large dwellings are needed. However, on the basis of evidence from the Danbury Survey and SHMA, the supply of larger homes should not be inhibited altogether.</p> <p>To the extent that bungalows hold wide appeal among the existing population and can also be expected to meet the needs of many individuals whose mobility is limited a lot, they should be promoted in new housing where possible.</p>
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6.2 Recommendations for next steps

168. This Neighbourhood Plan housing needs assessment aims to provide Danbury with evidence on a range of housing trends and issues from a range of relevant sources. We recommend that the neighbourhood planners should, as a next step, discuss the contents and conclusions with Chelmsford with a view to agreeing and formulating draft housing policies, bearing the following in mind:

- All Neighbourhood Planning Basic Conditions, but in particular the following: Condition A, namely that the Neighbourhood Plan has regard to national policies and advice contained in guidance issued by the Secretary of State; Condition D, that the making of the Neighbourhood Plan contributes to the achievement of sustainable development; and Condition E, which is the need for the Neighbourhood Plan to be in general conformity with the strategic policies of the adopted development plan;
- The views of Chelmsford – in particular in relation to the quantity of housing that should be planned for;
- The views of local residents;
- The views of other relevant local stakeholders, including housing developers;
- The numerous supply-side considerations, including local environmental constraints, the location and characteristics of suitable land, and any capacity work carried out by Chelmsford, including but not limited to the Strategic Housing Land Availability Assessment (SHLAA);
- The recommendations and findings of this study; and
- The impact of the Government's Standard Methodology on calculating housing need for Chelmsford and the neighbourhood plan areas within it.

169. This assessment has been provided in good faith by AECOM consultants on the basis of housing data, national guidance and other relevant and available information current at the time of writing.

170. Bearing this in mind, we recommend that the Neighbourhood Plan steering group should monitor carefully strategies and documents with an impact on housing policy produced by the Government, Chelmsford or any other relevant party and review the Neighbourhood Plan accordingly to ensure that general conformity is maintained.

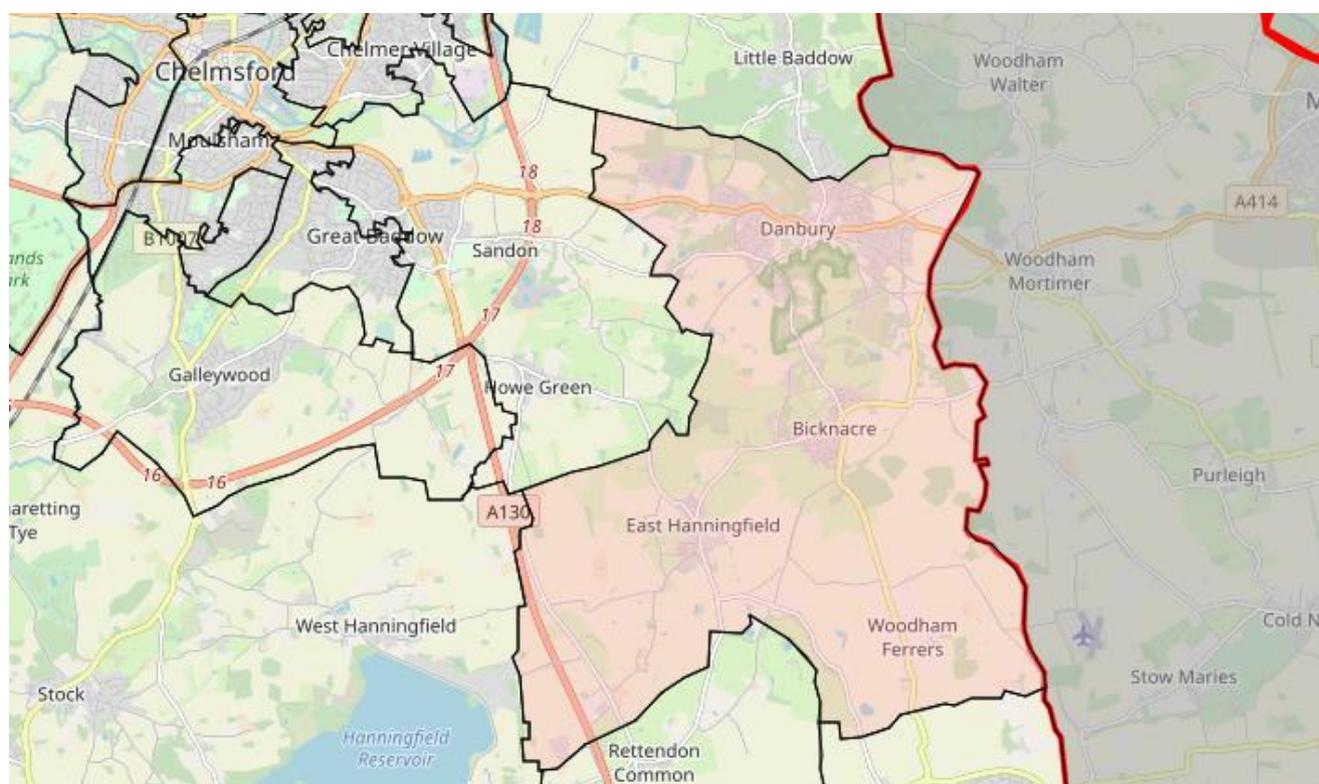
171. At the same time, monitoring on-going demographic or other trends over the Neighbourhood Plan period will help ensure the continued relevance and credibility of its policies.

Appendix A : Calculation of Affordability Thresholds

A.1 Assessment geography

172. As noted in the Tenure and Affordability chapter above, affordability thresholds can only be calculated on the basis of data on incomes across the Neighbourhood Plan area. Such data is available at MSOA level but not at the level of neighbourhood plan areas.
173. As such, when calculating affordability thresholds, an MSOA needs to be selected that is a best-fit proxy for the Neighbourhood Plan area. In the case of Danbury, it is considered that MSOA E02004500 is the closest realistic proxy for the Neighbourhood Plan area boundary, and as such, this is the assessment geography that has been selected. Note that the MSOA extends well beyond the Danbury NA, encompassing Bicknacre, East Hanningfield and Woodham Ferrers among other settlements. However, it does contain the entirety of the NA and, as no smaller geography is available for local income data, this is the most robust available proxy. A map of the MSOA appears below in Figure 6-1.

Figure 6-1: MSOA E02004500 used as a best-fit geographical proxy for the Neighbourhood Plan area



Source: ONS

A.2 Market housing

174. Market dwellings for sale and rent are increasingly accessible only to people on higher incomes. Choices in the housing market are driven principally by spending power, life stage, and personal taste.
175. The operation of the housing market is, in most circumstances, the best means of addressing the demand for different types of housing for sale. For this reason, it is important that planning policy does not place unnecessary burdens on the market that prevent its ability to respond to demand.
176. In this sense, the notion of development viability is essential. It is important not to deter development in the context of clear housing need; to do so will not only frustrate the delivery of new housing but also may deprive the community of resources for infrastructure improvements.

177. To determine affordability in market housing, we consider two primary indicators: income thresholds, which denote the maximum share of a family's income that should be spent on accommodation costs, and purchase thresholds, which denote the standard household income required to access mortgage products.

i) Market sales

178. The starting point for calculating the affordability of a dwelling for sale (i.e. the purchase threshold) from the perspective of a specific household is the loan to income ratio which most mortgage companies are prepared to agree. This ratio is conservatively estimated to be 3.5.

179. To produce a more accurate assessment of affordability, both the savings available for a deposit and the equity in the home from which the buyer is moving (if not a first-time buyer) should be taken into account. However, this data is not available for Danbury. As such, a reasonable assumption is therefore made that a 10% purchase deposit is available to the prospective buyer.

180. The value of an entry-level dwelling is considered the best representation of the segment of market housing most likely to be accessible to those on lower incomes.²¹ The value of an entry level dwelling used here is the lower quartile average house price from sales data from Land Registry over the year 2018. Though this is not necessarily reflected in the currently available properties on the local market, the larger sample size across 2018 as a whole and the difference between paid prices as recorded by Land Registry and asking prices visible on the market, render the 2018 Land Registry data more accurate for the purpose of this calculation.

181. The calculation is as follows:

- Value of an entry level dwelling = 425,000;
- Purchase deposit = £42,500 @10% of value;
- Value of dwelling for mortgage purposes = £382,500;
- Loan to income ratio = value of dwelling for mortgage purposes divided by 3.5;
- Purchase threshold (i.e. annual income needed to afford entry-level market housing) = £109,286.

ii) Private Rented Sector (PRS)

182. Income thresholds are used to calculate the affordability of rented and affordable housing tenures. Households are deemed able to afford a private rent property if the lower quartile private rent does not exceed 30% of net household income.

183. It is assumed that lower quartile private rent equates to the average rent paid in the Neighbourhood Plan area for a two-bedroom dwelling (enough living space for two or three individuals). In order to be in conformity with the Government guidance on overcrowding,²² such a home would require three habitable rooms (a flat or house with two bedrooms).

184. The property website Home.co.uk shows rental values for property in the Neighbourhood Plan area. The best available data is derived from properties available for rent within the CM3 postcode area, which covers a larger area than the Plan area itself but can be used as a reasonable proxy for it. Moreover, because it forms a larger geography with a greater number of rental properties offered, the larger sample size is likely to generate more robust findings.

185. According to Home.co.uk, there are 10 x 2 bedroom properties currently listed for rent across the plan area, with an average rent of £1,473 per calendar month. This is significantly higher than the median monthly rent of £850 for a 2 bedroom property for Chelmsford as a whole, as recorded in the SHMA of 2015.

186. It is possible to derive from this data the estimated income threshold for private rental sector dwellings in the Neighbourhood Plan area; the calculation is therefore:

- Annual rent = £1,473 x 12 = £17,671;

²¹ 'Entry-level dwelling' can be understood to comprise a property that costs the average value of dwellings falling into the lower quartile of house prices in the Neighbourhood Plan area, as set out in the Tenure and Affordability chapter above.

²² This is based on the concept of the 'room standard', which indicates a dwelling is legally overcrowded if two people of the opposite sex have to share a room to sleep in (this does not apply when couples share a room). See:

http://england.shelter.org.uk/housing_advice/repairs/overcrowding

- Multiplied by 3.33 (so that no more than 30% of income is spent on rent) = income threshold of £58,845.

187. The NPPF 2018 acknowledges that build-to-rent dwellings have a role to play in providing affordable market homes and may meet affordable housing need where they include a component of affordable private rent.

A.3 Affordable Housing

188. There are a range of tenures that constitute the definition of Affordable Housing within the 2019 NPPF: social rent and affordable rent, discounted market sales housing, and other affordable routes to home ownership.

189. This variety of tenures reflects an ambition by the Government to provide a pathway to home ownership for more sectors of the population, as well as introducing market principles into the provision of subsidised housing for rent. The aim is to divide affordable housing into a series of products designed to appeal to different sectors of the market and, by changing eligibility criteria, bring rents closer in line with people's ability to pay.

190. Each of the Affordable Housing tenures is considered in turn below.

i) Social rent

191. Rents in socially rented properties reflect a 'formula rent' based on a combination of individual property values and average earnings in each area, resulting in substantial discounts to market rents. As such, this tenure is suitable for the needs of those on low incomes and is subject to strict eligibility criteria.

192. To determine social rent levels, we used the data and statistical return from Homes England. This data is only available at the Local Authority level so Chelmsford must act as a proxy for Danbury. This data provides information about rents and the size and type of stock owned and managed by private registered providers and is presented for Chelmsford in the table below.

193. To determine the income needed, we continue to operate on the assumption that no more than 30% of income should be spent on rent. As for entry-level market rent, the figure we take forward for the affordability analysis is the 2 bedroom income threshold of 21,131.

Table A-1: Social rent levels (£)

Size	1 bed	2 beds	3 beds	4 beds	All
Average weekly social rent	£88	£102	£116	£138	£102
Annual average	£4,586	£5,283	£6,007	£7,194	£5,310
Income needed	£18,346	£21,131	£24,028	£28,777	£21,240

Source: Homes England, AECOM Calculations

ii) Affordable rent

194. Affordable rent is controlled at no more than 80% of the local market rent. As we have seen, the annual entry-level rent in Danbury is £17,671. In the event of a 20% reduction in rent to £14,137, the income threshold would reduce to an estimated £47,076. This tenure is usually only accessible to those on local authority and housing association waiting lists.

195. Although affordable rent at 80% of market rent is permitted, in practice most registered providers seek to cap rents so that they are affordable to those on universal credit, which is the group of people who will be accessing this tenure. This may be done by determining a percentage of the maximum benefit available to a household that should be spent on housing costs: for example, it might be set at 40% of the maximum universal credit amount of £20,000, meaning that affordable rent for larger homes for families would be capped at £8,000 per year.

1. Given that the cost of renting is high in Danbury, it is very unlikely that the 20% discount on market rents will be realistic and applied in practice. Because registered providers' approach will differ across the area and is not published, another indicator is used.
2. Chelmsford's Local Housing Allowance (LHA) rates for 2019-20 are also provided in Table A-2 below. Affordable rent levels can also be set with reference to the housing allowance that will be paid to the tenant, and this measure

is considered to be a more reliable measure of the affordable rent tenure in this instance. A housing association would be within their rights to charge the full LHA amount, and so we will take forward the LHA-derived figure in the comparative analysis at the end of this chapter. Because a weighted average is not available, we use the cost of a 2 bedroom unit in line with the proxy used elsewhere for an entry-level dwelling.

Table A-2: Chelmsford Local Housing Allowance levels

Size	1 bed	2 beds	3 beds	4 beds
Average rent per calendar week	£129.78	£160.73	£169.58	£246.05
Annual average rent	£6,749	£8,358	£8,818	£12,795
Income needed	£22,473	£27,832	£29,364	£42,606

Source: <http://lha-direct.voa.gov.uk>

iii) Intermediate tenures

- Intermediate housing includes homes for sale and rent provided at a cost above social rent, but below market levels, subject to the criteria in the affordable housing definition above. They can include shared equity (shared ownership and equity loans), other low-cost homes for sale and intermediate rent, but not affordable rented housing.
- In paragraph 64 of the NPPF 2019, the Government introduces a recommendation that “*where major housing development is proposed, planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership*”.

Discounted market sale (20% discount)

- Whether to treat discounted market sale homes as affordable housing or not depends on whether lowering the asking price of new build homes of a size and type suitable to first time buyers by 20% would bring them within reach of people currently unable to access market housing for purchase.
- To provide a conservative assessment of the suitability of discounted market sale homes, it is appropriate to apply the value we have estimated for an entry-level dwelling, namely £425,000. Applying a discount of 20% provides an approximate selling price of £340,000. Allowing for a 10% deposit further reduces the value of the property to £306,000. The income threshold at a loan to income ratio of 3.5 is £87,429.
- However, this method of estimating the cost of discounted market sale homes is based on an assumption that they will be priced with reference to the value of lower quartile dwellings, with a discount of 20% applied. In practice, there is nothing in national regulations to require that their price is set in this way. Developers could instead set prices with reference to average new build prices or a market value they establish themselves based on their sales prices in the area, both of which tend to be much higher than lower quartile prices. This ambiguity means that the cost of discounted market sale homes can in reality be much higher than the optimistic calculation presented here.

Shared ownership

- Shared ownership involves the purchaser buying an initial share in a property typically of between 25% and 75% and paying rent on the share retained by the provider. Shared ownership is flexible in two respects, in the share which can be purchased and in the rental payable on the share retained by the provider. Both of these are variable. The share owned by the leaseholder can be varied by 'staircasing'. Generally, staircasing will be upward, thereby increasing the share owned.
- In exceptional circumstances (for example, as a result of financial difficulties, and where the alternative is repossession), and at the discretion of the provider, shared owners may staircase down, thereby reducing the share they own. Shared equity is available to first-time buyers, people who have owned a home previously and council and housing association tenants with a good credit rating whose annual household income does not exceed £80,000.
- To determine the affordability of shared ownership, calculations are based on the lower quartile house price of £425,000.²³ The deposit available to the prospective purchaser is assumed to be 10% of the value of the dwelling, and the standard loan to income ratio of 3.5 is used to calculate the income required to obtain a mortgage. The income

²³ It is important to note that current shared ownership models are only available for new build homes, which are assumed to cost more than this average taken from all open market housing, which also includes property re-sale.

required to cover the rental component of the dwelling is based on the assumption that a household spends no more than 30% of the income on rent (as for the income threshold for the private rental sector).

11. A 25% equity share of £425,000 is 106,250, from which a 10% deposit of £10,625 is deducted. The mortgage value of £95,625 (£106,250 - 10,625) is then divided by 3.5. To secure a mortgage of £95,625, an annual income of £27,321 is therefore needed. In addition to mortgage costs, rent is charged on the remaining 75% shared ownership equity, i.e. the unsold value of £318,750. An ongoing annual rent equivalent to 2.75% of the value of the unsold equity is assumed, which is £7,969 and requires an income of £31,875. Therefore, an income of around £59,196 (£27,321 + £31,875) is required to afford a 25% shared equity purchase of an entry-level house with annual rent.
12. The same calculations are repeated for shared ownership at a 50% and 75% equity share, producing affordability thresholds of £75,893 and £92,589 respectively.

Appendix B : Housing Needs Assessment Glossary

Adoption

This refers to the final confirmation of a local plan by a local planning authority.

Affordability

The terms 'affordability' and 'affordable housing' have different meanings. 'Affordability' is a measure of whether housing may be afforded by certain groups of households. 'Affordable housing' refers to particular products outside the main housing market.

Affordability Ratio

Assessing affordability involves comparing house costs against the ability to pay. The ratio between lower quartile house prices and the lower quartile income or earnings can be used to assess the relative affordability of housing. The Ministry for Housing, Community and Local Governments publishes quarterly the ratio of lower quartile house price to lower quartile earnings by local authority (LQAR) as well as median house price to median earnings by local authority (MAR) e.g. income = £25,000, house price = £200,000. House price: income ratio = £200,000/£25,000 = 8, (the house price is 8 times income).

Affordable Housing (NPPF Definition)

Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:

a) Affordable housing for rent: meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).

b) Discounted market sales housing: is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.

c) Other affordable routes to home ownership: is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low-cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement.

Affordable rented housing

Rented housing let by registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is not subject to the national rent regime but is subject to other rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable). The national rent regime is the regime under which the social rents of tenants of social housing are set, with particular reference to the Guide to Social Rent Reforms (March 2001) and the Rent Influencing Regime Guidance (October 2001). Local market rents are calculated using the Royal Institution for Chartered Surveyors (RICS) approved valuation methods²⁴.

Age-Restricted General Market Housing

A type of housing is generally for people aged 55 and over and the active elderly. It may include some shared amenities such as communal gardens, but does not include support or care services.

²⁴ The Tenant Services Authority has issued an explanatory note on these methods at <http://www.communities.gov.uk/documents/planningandbuilding/pdf/1918430.pdf>

Annual Monitoring Report

A report submitted to the Government by local planning authorities assessing progress with and the effectiveness of a Local Development Framework.

Basic Conditions

The Basic Conditions are the legal tests that are considered at the examination stage of neighbourhood development plans. They need to be met before a plan can progress to referendum.

Backlog need

The backlog need constitutes those households who are eligible for Affordable Housing, on account of homelessness, overcrowding, concealment or affordability, but who are yet to be offered a home suited to their needs.

Bedroom Standard²⁵

The bedroom standard is a measure of occupancy (whether a property is overcrowded or under-occupied, based on the number of bedrooms in a property and the type of household in residence). The Census overcrowding data is based on occupancy rating (overcrowding by number of rooms not including bathrooms and hallways). This tends to produce higher levels of overcrowding/ under occupation. A detailed definition of the standard is given in the Glossary of the EHS Household Report.

Co-living

Co-living denotes people who do not have family ties sharing either a self-contained dwelling (i.e., a 'house share') or new development akin to student housing in which people have a bedroom and bathroom to themselves, but share living and kitchen space with others. In co-living schemes each individual represents a separate 'household'.

Community Led Housing/Community Land Trusts

Housing development, provision and management that is led by the community is very often driven by a need to secure affordable housing for local people in the belief that housing that comes through the planning system may be neither the right tenure or price-point to be attractive or affordable to local people. The principle forms of community-led models include cooperatives, co-housing communities, self-help housing, community self-build housing, collective custom-build housing, and community land trusts. By bringing forward development which is owned by the community, the community is able to set rents and/or mortgage payments at a rate that it feels is appropriate. The Government has a range of support programmes for people interested in bringing forward community led housing.

Community Right to Build Order²⁶

A community right to build order is a special kind of neighbourhood development order, granting planning permission for small community development schemes, such as housing or new community facilities. Local community organisations that meet certain requirements or parish/town councils are able to prepare community right to build orders.

Concealed Families (Census definition)²⁷

The 2011 Census defined a concealed family as one with young adults living with a partner and/or child/children in the same household as their parents, older couples living with an adult child and their family or unrelated families sharing a household. A single person cannot be a concealed family; therefore, one elderly parent living with their adult child and family or an adult child returning to the parental home is not a concealed family; the latter are reported in an ONS analysis on increasing numbers of young adults living with parents.

Equity Loans/Shared Equity

An equity loan which acts as a second charge on a property. For example, a household buys a £200,000 property with a 10% equity loan (£20,000). They pay a small amount for the loan and when the property is sold e.g. for £250,000 the lender

²⁵ See <https://www.gov.uk/government/statistics/english-housing-survey-2011-to-2012-household-report>

²⁶ See <https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary>

²⁷ See http://webarchive.nationalarchives.gov.uk/20160107160832/http://www.ons.gov.uk/ons/dcp171776_350282.pdf

receives 10% of the sale cost (£25,000). Some equity loans were available for the purchase of existing stock. The current scheme is to assist people to buy new build.

Extra Care Housing or Housing-With-Care

Housing which usually consists of purpose-built or adapted flats or bungalows with a medium to high level of care available if required, through an onsite care agency registered through the Care Quality Commission (CQC). Residents are able to live independently with 24 hour access to support services and staff, and meals are also available. There are often extensive communal areas, such as space to socialise or a wellbeing centre. In some cases, these developments are known as retirement communities or villages - the intention is for residents to benefit from varying levels of care as time progresses.

Fair Share

'Fair share' is an approach to determining housing need within a given geographical area based on a proportional split according to the size of the area, the number of homes in it, or its population.

Habitable Rooms

The number of habitable rooms in a home is the total number of rooms, excluding bathrooms, toilets and halls.

Household Reference Person (HRP)

The concept of a Household Reference Person (HRP) was introduced in the 2001 Census (in common with other government surveys in 2001/2) to replace the traditional concept of the head of the household. HRPs provide an individual person within a household to act as a reference point for producing further derived statistics and for characterising a whole household according to characteristics of the chosen reference person.

Housing Market Area

A housing market area is a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work. It might be the case that housing market areas overlap.

The extent of the housing market areas identified will vary, and many will in practice cut across various local planning authority administrative boundaries. Local planning authorities should work with all the other constituent authorities under the duty to cooperate.

Housing Needs

There is no official definition of housing need in either the National Planning Policy Framework or the National Planning Practice Guidance. Clearly, individuals have their own housing needs. The process of understanding housing needs at a population scale is undertaken via the preparation of a Strategic Housing Market Assessment (see below).

Housing Needs Assessment

A Housing Needs Assessment (HNA) is an assessment of housing needs at the Neighbourhood Area level.

Housing Products

Housing products simply refers to different types of housing as they are produced by developers of various kinds (including councils and housing associations). Housing products usually refers to specific tenures and types of new build housing.

Housing Size (Census Definition)

Housing size can be referred to either in terms of the number of bedrooms in a home (a bedroom is defined as any room that was intended to be used as a bedroom when the property was built, any rooms permanently converted for use as bedrooms); or in terms of the number of rooms, excluding bathrooms, toilets halls or landings, or rooms that can only be used for storage. All other rooms, for example, kitchens, living rooms, bedrooms, utility rooms, studies and conservatories are counted. If two rooms have been converted into one, they are counted as one room. Rooms shared between more than one household, for example a shared kitchen, are not counted.

Housing Type (Census Definition)

This refers to the type of accommodation used or available for use by an individual household (i.e. detached, semi-detached, terraced including end of terraced, and flats). Flats are broken down into those in a purpose-built block of flats, in parts of a converted or shared house, or in a commercial building.

Housing Tenure (Census Definition)

Tenure provides information about whether a household rents or owns the accommodation that it occupies and, if rented, combines this with information about the type of landlord who owns or manages the accommodation.

Income Threshold

Income thresholds are derived as a result of the annualisation of the monthly rental cost and then asserting this cost should not exceed 35% of annual household income.

Intercensal Period

This means the period between the last two Censuses, i.e. between years 2001 and 2011.

Intermediate Housing

Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low-cost homes for sale and intermediate rent, but not affordable rented housing. Homes that do not meet the above definition of affordable housing, such as 'low-cost market' housing, may not be considered as affordable housing for planning purposes.

Life Stage modelling

Life Stage modelling is forecasting need for dwellings of different sizes by the end of the Plan period on the basis of changes in the distribution of household types and key age brackets (life stages) within the NA. Given the shared behavioural patterns associated with these metrics, they provide a helpful way of understanding and predicting future community need. This data is not available at neighbourhood level, so LPA level data is employed on the basis of the NA falling within its defined Housing Market Area.

Life-time Homes

Dwellings constructed to make them more flexible, convenient adaptable and accessible than most 'normal' houses, usually according to the Lifetime Homes Standard, 16 design criteria that can be applied to new homes at minimal cost: <http://www.lifetimehomes.org.uk/>.

Life-time Neighbourhoods

Lifetime neighbourhoods extend the principles of Lifetime Homes into the wider neighbourhood to ensure the public realm is designed in such a way to be as inclusive as possible and designed to address the needs of older people, for example providing more greenery and more walkable, better connected places.

Local Development Order

An Order made by a local planning authority (under the Town and Country Planning Act 1990) that grants planning permission for a specific development proposal or classes of development.

Local Enterprise Partnership

A body, designated by the Secretary of State for Communities and Local Government, established for the purpose of creating or improving the conditions for economic growth in an area.

Local housing need (NPPF definition)

The number of homes identified as being needed through the application of the standard method set out in national planning guidance (or, in the context of preparing strategic policies only, this may be calculated using a justified alternative approach as provided for in paragraph 60 of this Framework).

Local Planning Authority

The public authority whose duty it is to carry out specific planning functions for a particular area. All references to local planning authority apply to the District Council, London Borough Council, County Council, Broads Authority, National Park Authority or the Greater London Authority, to the extent appropriate to their responsibilities.

Local Plan

This is the plan for the future development of the local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. Current core strategies or other planning policies form part of the Local Plan and are known as 'Development Plan Documents' (DPDs).

Lower Quartile

The bottom 25% value, i.e. of all the properties sold, 25% were cheaper than this value and 75% were more expensive. The lower quartile price is used as an entry level price and is the recommended level used to evaluate affordability; for example, for first time buyers.

Lower Quartile Affordability Ratio

The Lower Quartile Affordability Ratio reflects the relationship between Lower Quartile Household Incomes and Lower Quartile House Prices, and is a key indicator of affordability of market housing for people on relatively low incomes.

Market Housing

Market housing is housing which is built by developers (which may be private companies or housing associations, or Private Registered Providers), for the purposes of sale (or rent) on the open market.

Mean (Average)

The mean or the average is, mathematically, the sum of all values divided by the total number of values. This is the more commonly used "average" measure as it includes all values, unlike the median.

Median

The middle value, i.e. of all the properties sold, half were cheaper and half were more expensive. This is sometimes used instead of the mean average as it is not subject to skew by very large or very small statistical outliers.

Median Affordability Ratio

The Lower Quartile Affordability Ratio reflects the relationship between Median Household Incomes and Median House Prices, and is a key indicator of affordability of market housing for people on middle-range incomes.

Mortgage Ratio

The mortgage ratio is the ratio of mortgage value to income which is typically deemed acceptable by banks. Approximately 75% of all mortgage lending ratios fell below 4 in recent years²⁸, i.e. the total value of the mortgage was less than 4 times the annual income of the person who was granted the mortgage.

Neighbourhood Development Order (NDO)

An NDO will grant planning permission for a particular type of development in a particular area. This could be either a particular development, or a particular class of development (for example retail or housing). A number of types of development will be excluded from NDOs, however. These are minerals and waste development, types of development that, regardless of scale, always need Environmental Impact Assessment, and Nationally Significant Infrastructure Projects.

Neighbourhood plan

A plan prepared by a Parish or Town Council or Neighbourhood Forum for a particular neighbourhood area (made under the Planning and Compulsory Purchase Act 2004).

Older People

People over retirement age, including the active, newly-retired through to the very frail elderly, whose housing needs can encompass accessible, adaptable general needs housing for those looking to downsize from family housing and the full range of retirement and specialised housing for those with support or care needs.

Output Area/Lower Super Output Area/Middle Super Output Area

An output area is the lowest level of geography for publishing statistics, and is the core geography from which statistics for other geographies are built. Output areas were created for England and Wales from the 2001 Census data, by grouping a number of households and populations together so that each output area's population is roughly the same. 175,434 output areas were created from the 2001 Census data, each containing a minimum of 100 persons with an average of 300 persons. Lower Super Output Areas consist of higher geographies of between 1,000-1,500 persons (made up of a number of individual Output Areas) and Middle Super Output Areas are higher than this, containing between 5,000 and 7,200 people, and made up of individual Lower Layer Super Output Areas. Some statistics are only available down to Middle Layer Super Output Area level, meaning that they are not available for individual Output Areas or parishes.

Overcrowding

There is no single agreed definition of overcrowding, however, utilising the Government's bedroom standard, overcrowding is deemed to be in households where there is more than one person in the household per room (excluding kitchens, bathrooms, halls and storage areas). As such, a home with one bedroom and one living room and one kitchen would be deemed overcrowded if three adults were living there.

Planning Condition

A condition imposed on a grant of planning permission (in accordance with the Town and Country Planning Act 1990) or a condition included in a Local Development Order or Neighbourhood Development Order.

Planning Obligation

A legally enforceable obligation entered into under section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal.

Purchase Threshold

Purchase thresholds are calculated by netting 10% off the entry house price to reflect purchase deposit. The resulting cost is divided by 4 to reflect the standard household income requirement to access mortgage products.

²⁸ See <https://www.which.co.uk/news/2017/08/how-your-income-affects-your-mortgage-chances/>

Proportionate and Robust Evidence

Proportionate and robust evidence is evidence which is deemed appropriate in scale, scope and depth for the purposes of neighbourhood planning, sufficient so as to meet the Basic Conditions, as well as robust enough to withstand legal challenge. It is referred to a number of times in the PPG and its definition and interpretation relies on the judgement of professionals such as Neighbourhood Plan Examiners.

Private Rented

The Census tenure private rented includes a range of different living situations in practice, such as private rented/ other including households living "rent free". Around 20% of the private rented sector are in this category, which will have included some benefit claimants whose housing benefit at the time was paid directly to their landlord. This could mean people whose rent is paid by their employer, including some people in the armed forces. Some housing association tenants may also have been counted as living in the private rented sector because of confusion about what a housing association is.

Retirement Living or Sheltered Housing

Housing for older people which usually consists of purpose-built flats or bungalows with limited communal facilities such as a lounge, laundry room and guest room. It does not generally provide care services, but provides some support to enable residents to live independently. This can include 24 hour on-site assistance (alarm) and a warden or house manager.

Residential Care Homes and Nursing Homes

Housing for older people comprising of individual rooms within a residential building and provide a high level of care meeting all activities of daily living. They do not usually include support services for independent living. This type of housing can also include dementia care homes.

Rural Exception Sites

Small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection. Small numbers of market homes may be allowed at the local authority's discretion, for example where essential to enable the delivery of affordable dwellings without grant funding.

Shared Ownership

Housing where a purchaser part buys and part rents from a housing association or local authority. Typical purchase share is between 25% and 75%, and buyers are encouraged to buy the largest share they can afford. Generally, applies to new build properties, but re-sales occasionally become available. There may be an opportunity to rent at intermediate rent level before purchasing a share in order to save/increase the deposit level

Sheltered Housing²⁹

Sheltered housing (also known as retirement housing) means having your own flat or bungalow in a block, or on a small estate, where all the other residents are older people (usually over 55). With a few exceptions, all developments (or 'schemes') provide independent, self-contained homes with their own front doors. There are many different types of scheme, both to rent and to buy. They usually contain between 15 and 40 properties, and range in size from studio flats (or 'bedsits') through to 2 and 3 bedroomed. Properties in most schemes are designed to make life a little easier for older people - with features like raised electric sockets, lowered worktops, walk-in showers, and so on. Some will usually be designed to accommodate wheelchair users. And they are usually linked to an emergency alarm service (sometimes called 'community alarm service') to call help if needed. Many schemes also have their own 'manager' or 'warden', either living on-site or nearby, whose job is to manage the scheme and help arrange any services residents need. Managed schemes will also usually have some shared or communal facilities such as a lounge for residents to meet, a laundry, a guest flat and a garden.

Strategic Housing Land Availability Assessment

²⁹ See <http://www.housingcare.org/jargon-sheltered-housing.aspx>

A Strategic Housing Land Availability Assessment (SHLAA) is a document prepared by one or more local planning authorities to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the Plan period. SHLAAs are sometimes also called LAAs (Land Availability Assessments) or HELAAs (Housing and Economic Land Availability Assessments) so as to integrate the need to balance assessed housing and economic needs as described below.

Strategic Housing Market Assessment (NPPF Definition)

A Strategic Housing Market Assessment (SHMA) is a document prepared by one or more local planning authorities to assess their housing needs under the 2012 version of the NPPF, usually across administrative boundaries to encompass the whole housing market area. The NPPF makes clear that SHMAs should identify the scale and mix of housing and the range of tenures the local population is likely to need over the Plan period. Sometimes SHMAs are combined with Economic Development Needs Assessments to create documents known as HEDNAs (Housing and Economic Development Needs Assessments).

Specialist Housing for the Elderly

Specialist housing for the elderly, sometimes known as specialist accommodation for the elderly, encompasses a wide range of housing types specifically aimed at older people, which may often be restricted to those in certain older age groups (usually 55+ or 65+). This could include residential institutions, sometimes known as care homes, sheltered housing, extra care housing, retirement housing and a range of other potential types of housing which has been designed and built to serve the needs of older people, including often providing care or other additional services. This housing can be provided in a range of tenures (often on a rented or leasehold basis).

Social Rented Housing

Social rented housing is owned by local authorities and private registered providers (as defined in Section 80 of the Housing and Regeneration Act 2008.). Guideline target rents for this tenure are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with Homes England.³⁰

³⁰ See <http://www.communities.gov.uk/documents/planningandbuilding/doc/1980960.doc#Housing>

LAND NORTH OF RUNSELL LANE, DANBURY, CM3 4PF

On behalf of
Gleeson Land

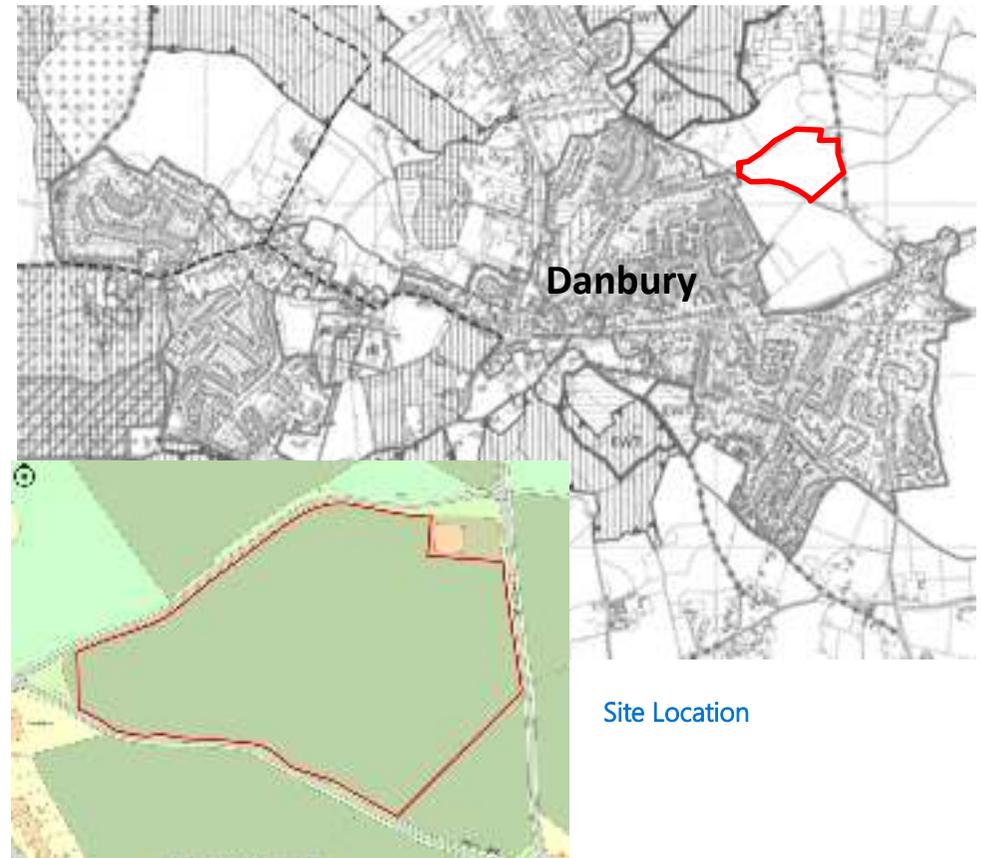
June 2024
Our Ref: C24041



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This brochure provides supplementary information to support the promotion of land to the north of Runsell Lane, Danbury, CM3 4PF. It is prepared by Phase 2 Planning and Development Ltd for Gleeson Land, who are promoting the site on behalf of the landowner.

This land, which adjoins the Key Service Centre of Danbury and measures around 3.6 hectares, is promoted for a sensitively designed, residential development, providing a range of market and affordable homes. This will be coupled with substantial 'green infrastructure' in the form of new open space for recreation and mental wellbeing and areas for biodiversity enhancement.



Site Location

2. SITE LOCATION AND CONTEXT

The site is located on the northern side of Runsell Lane in Danbury. It lies in close proximity to the existing built up area, which is located to the south-west and west of the site and accessed by Hopping Jacks Lane, which is a suitable route for cyclists and has footways in place for pedestrians.

The site comprises a single parcel of land in agricultural use that is somewhat irregular in shape and is bounded on three sides by existing roads. Runsell Lane runs along the southern boundary, and is generally free of boundary vegetation, connecting the northern part of Danbury to Maldon Road (A414). The north-western boundary is formed by Hopping Jacks Lane, which runs from Runsell Lane to Twitty Fee and comprises a vegetated boundary in places. The eastern boundary is formed by Twitty Fee, which is a protected lane bounded by hedgerows, running from Runsell Lane in the south to a commercial area and a small number of dwellings to the north. Adjacent to the northern part of the site, lies Twitty Grange, a steel-frame warehouse style building that is operating as a retail members club.

Land immediately to the south-east of the site has planning permission for use as an enclosed dog walking area, which has an area of hardstanding for parking. Land to the south of Runsell Lane is promoted by Gladman Developments for residential development. An Inspector considered that site to be *“well located to allow new occupiers the opportunity to meet many of their day to day needs by modal choices other than the car.”*

Danbury is identified within the Local Plan as a ‘Key Service Settlement’, which is the second tier in the settlement hierarchy, below ‘City or Town’ within which Chelmsford and South Woodham Ferrers fall. The Key Service Settlements are recognised in the Local Plan (paragraph 6.27) as the focus for housing provision outside the top tier of settlements, with *“a higher level of growth due to their higher level of services, facilities and economic activity.”* The Plan continues by stating *“Growth in Key Service Settlements aims to increase their self-containment and enhance their service role, reflecting the aspirations of national policy in promoting stronger communities”.*

Bus stops are in place in the centre of the village, although the nearest bus stops are situated on the A414 Maldon Road to the south of the site (some 600m walking distance) which are served by twice-hourly bus routes to Chelmsford and Burnham-on-Crouch. Opportunities to deliver pedestrian connections to the A414 Maldon Road via new footways on Runsell Lane could be explored, subject to the extent of public highway, tree constraints etc.

Danbury has a population of around 5,200, with around 2,100 dwellings. It has a good range of services and facilities, as recognised by both the Local Plan and the Neighbourhood Plan. The table provides a summary of the nearest facilities to the site.

Category	Nearest	Distance from Site (walk time in minutes)
Education	Danbury Pre-School	900m (13)
	St John’s C of E Primary	900m (13)
	Heathcote Preparatory School and Nursery	900m (13)
Employment (Main Area)	Danbury Business Park	1km (14)
Pubs/Restaurants/Takeaways	The Anchor	500m
	Henri’s Fish and Grill	650m (9)
	Tea on the Green	850m (12)
Retail	Esso Petrol Filling Station	650m (9)
	Tesco Esso Express	650m (9)
	Boots Pharmacy	800m (10)
	The Co-operative Food Danbury	1.1km (14)
Ecumenical	English Martyrs Catholic Church	650m (9)
	Danbury Mission Church	850m (12)
Community	Danbury Village Hall	1.3km (19)
	Danbury Library	1.3km (19)
Recreation	Children’s Play Area	900m (13)
	Sports Ground	1.3km (19)
Public Transport	Bus Stops	600m (8)
	‘Park and Ride’	5.4km
	Chelmsford Railway Station	10.4km

3. POLICY BACKGROUND

Adopted Chelmsford Local Plan

The site adjoins the current settlement boundary for Danbury in the adopted Local Plan Policies Map. Twitty Fee, which forms the eastern boundary of the site, is designated as a protected lane (shown below with orange dots). Land designated as an Essex Wildlife Trust Nature Reserve and open space is located over 100 metres to the north west of the site. This land forms part of the Woodham Walter Common SSSI.



Extract from the Adopted Local Plan Policies Map showing the location of the site

The adopted Local Plan recognises the need for new housing, stating that Chelmsford is a largely affluent area where average house prices and rents are high, sustained by high demand. It recognises that this creates an affordability issue with significant demand for affordable housing and starter homes for first time buyers or those on lower incomes. There is also an acknowledged demand for supported housing and independent living accommodation for older people and adults with disabilities.

Emerging Danbury Neighbourhood Plan

The adopted Local Plan identifies that Danbury will deliver around 100 dwellings through its Neighbourhood Plan during the period up to 2036 and the emerging Neighbourhood Plan seeks to allocate 93 dwellings across five sites over this period. This is a limited increase in new housing stock in an area of high demand, representing an increase of less than 5% of the existing stock.

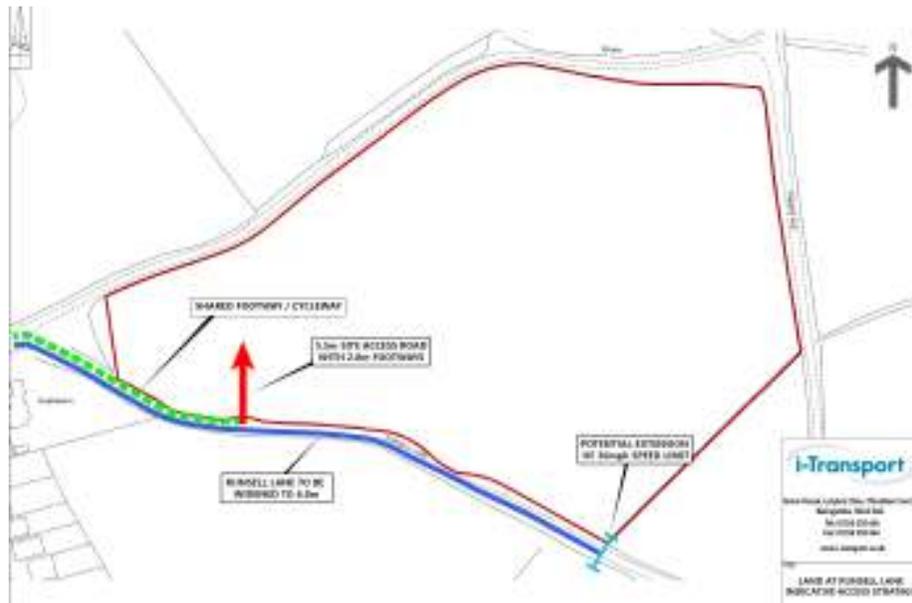
The emerging Local Plan has an extended time frame up to 2041, yet does not increase the allocation for Danbury beyond 100 to cover the increased time period.

It is proposed that this site should be included as an additional allocation within the extended Local Plan period to ensure that locally arising housing needs continue to be met.

4. OPPORTUNITIES AND CONSTRAINTS

Access and Movement

Transport Consultants have assessed the site and confirm that suitable access can be provided from Runsell Lane in the form of a simple priority junction with a 5.5 metre access road extending into the site (as shown in the indicative access strategy (figure below) for vehicles, with 2 metre footways. This would be in combination with widening Runsell Lane to 5.5m along the entire site frontage to allow two cars to pass easily. This is possible due to the long continuous site frontage with the public highway along Runsell Lane which is largely free of boundary vegetation. In addition to widening Runsell lane to 5.5m, a new 3m footway/cycleway can also be delivered along Runsell Lane to connect into Hopping Jacks Lane, as shown in the image below.



Proposed Access Arrangements

Runsell Lane is subject to the national speed limit of 60mph, but speed surveys indicate that vehicle speeds are around the 35/40mph. There is ample site frontage to design to achieve visibility splays in line with these recorded speeds, however an extension of the existing 30mph speed limit is proposed.

Trip generation assessment predicts that the majority of trips are expected to be to/from Chelmsford to the west via the A414 and when distributed across the wider network are unlikely to result in material off-site impacts.

Regarding highway safety, a review of accident data indicates that there are low numbers of accidents in the vicinity of the site and therefore there is unlikely to be a highway safety issue.

There are bus stops within 600 metres of the site (approximately 8 minute walk), served by a frequent bus route. Proposals could incorporate upgrades to the nearest bus stops.

In summary, the site is situated in a location which allows for genuine opportunities for sustainable travel, as confirmed by an Inspector in relation to land immediately to the south. The representation site has with safe and suitable access achievable from Runsell Lane. Once distributed across the network, traffic impacts will be minimal.

Ecology

Ecological assessments of the site have yet to be undertaken, however they will be carried out as the proposals for this site progress. Given the arable nature of the site, it is envisaged that the proposals can be carried out without compromising ecology, whilst providing opportunities for new habitat enhancement.

Heritage

Garlands Farmhouse is a Grade II Listed Building located around 250 metres to the south-east of the site, on the north side of Runsell Lane and is visually separated from the site. Brocks Farmhouse is Grade II Listed and is located 200 metres to the north-east and is visually separated from the site by dense vegetation.

Development of the site will not impact on designated or non-designated heritage assets.

Drainage

The site lies within Flood Zone 1 and therefore has a low risk of flooding. Drainage proposals will be developed in due course.

4. OPPORTUNITIES AND CONSTRAINTS

Landscape

The site comprises an open arable field with existing vegetation limited to parts of the site's boundary.



Extract from Google Maps showing the Site

Woodham Walter Common SSSI is located to the north-west of the site, separated by around 100 metres, and comprises broadleaved, mixed and yew woodland.

The landscape value of this site is considered to be of moderate value. It is an area of ordinary non-designated landscape, and whilst it has a recognisable intact character, the nature conservation interest of the site is limited.

It is considered that the development of this site would take the form of a landscape led scheme incorporating on site open space. Details in terms of the open space provision would be agreed with relevant stakeholders in due course.

Existing Trees and New Tree Planting

The trees on this site are limited to the boundary vegetation and would not be affected by development proposals for this site. A tree survey will be undertaken in due course.

The site presents opportunities for new tree planting, with appropriate native species. Development of this site would result in a substantial net gain of trees.



Google Street View Images of the Site from Runsell Lane and from Twitty Fee

5. THE PROPOSALS

Residential Development

It is proposed that this site could accommodate around 71 dwellings, as confirmed by the Council's SHELAA assessment. The exact number of dwellings achievable on the site would be tested and confirmed at the design stage.

In terms of housing mix, a policy compliant level of affordable housing is assumed. The local Housing Needs Assessment (2020) identified that Danbury has a high proportion of older residents along with a high proportion of larger properties. It is therefore proposed that dwellings on site would be predominantly one to three bedrooms which recognises the need for smaller and mid-sized dwellings identified by the survey. Smaller properties were identified as typically being more suitable and achievable for young people.

The Housing Needs Survey also identified a need for bungalows to enable older people to downsize, whilst staying in the local area. It is therefore proposed that development would include some bungalows on this site.

The lack of site constraints and current agricultural use mean that the site could come forward quickly to accord with the Council's desired timescales. The site is of a sufficient size to come forward independently with as a development that provides a mix of private and affordable housing that meets local housing needs, whilst providing the highways improvements to Runsell Lane.

As recognised in this brochure, the sustainability credentials of Danbury mean that it could sustainably accommodate a higher level of development that goes beyond the representation site. In the event that the Council seeks to achieve this, then the site could come forward as part of a wider masterplan to include development of land to the south of Runsell Lane, which is being promoted for development by Gladman Developments.

Sustainable Development Principles

It is proposed that the following sustainable development principles would be incorporated development on this site:

- All dwellings to 'Future Homes Standard' as a minimum
- All dwellings seeking to achieve Net Zero Carbon in operation, including meeting space heating demand limits, being fossil fuel free and providing on-site renewable energy
- Orientation of dwellings to maximise solar gain and use of design features to allow for shading
- Airtight dwellings that allow for efficient heating and cooling
- Use of low carbon material
- All dwellings to meet Building Regulations optional requirements for water efficiency
- High speed internet connectivity
- Incorporate green walls and roofs and wildlife bricks where practical
- Maximise use of natural materials
- Dwellings set back from the road facilitating road widening and a pedestrian/cycle route along Runsell Lane
- Sensitively integrated cycle parking and waste and recycling storage
- One active electric vehicle charging unit to be provided for each dwelling

6. SUMMARY

The Proposals

This 3.6 hectare site has the ability to deliver new homes in a sustainable location on the edge of Danbury, which is identified by the Council as a Key Service Settlement. It is proposed that it could accommodate around 71 dwellings as identified by the Council in their SHELAA. The exact quantum of development would be subject to testing at the design stage.

Initial assessments by transport consultants have confirmed that the site is situated in a location which allows for genuine opportunities for sustainable travel; with safe and suitable site access achievable from Runsell Lane. Once distributed across the network, traffic impacts will be minimal.

The development will integrate affordable and market housing, creating a balanced and cohesive community that ensures the standard of affordable housing stays level with market housing.

As set out in the preceding section, it is proposed that this site would come forward as a stand alone scheme. However, if the Council seek a larger development to accommodate a larger number of dwellings, it could come forward as part of a wider masterplan to include development of land to the south of Runsell Lane.

Phase 2 Planning and Gleeson Land would welcome the opportunity to discuss this site further with Chelmsford City Council and the Danbury Neighbourhood Plan group.

Gleeson Land

Gleeson has a strong track record in providing deliverable planning consents to the housebuilding industry which regularly results in new housing being built out in a timely manner. The average time from a Gleeson site receiving outline planning consent to commencement of development is 22 months. The average time from commencement to first occupation is 10 months. The allocation of Gleeson's land in the development plan could therefore provide new housing well within the first five years of the plan review period or at a later stage to meet longer term needs.



To discuss these proposals, please contact Phase 2 Planning and Development, as the planning consultants acting for Gleeson Homes and the landowner

270 Avenue West | Skyline 120 | Great Notley | Braintree | Essex | CM77 7AA

Email: office@phase2planning.co.uk Telephone: 01376 329059

Comment

Consultee Mrs Sarah Power (1360020)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mrs Sarah Power (1360020)

Comment ID DNP-108

Response Date 19/06/24 11:18

Status Processed

Submission Type Web

Version 0.3

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site B: Land at Tyndale Farm West

Question 2

Please add your comments below

House building at this location has serious issues as follows:

The risk of a traffic and pedestrian major road incident is deadly high. We live on Hyde Lane and cannot cross the main Rd on foot (we walk to the crossing 5 minutes in the wrong direction and cross and then walk back) and in most cases we cannot turn out of Hyde Lane safely whilst driving. We access all of Danbury - school, doctors etc and then Chelmsford itself via Hyde Lane in the opposite direction leaving the village by the single track road there and then cutting back up to the main road (A414) at Eve's Corner. This system will cause chaos in the single lane back roads, when others realise this is the only reliable route out.

Turning out and into the planned development will cause many road accidents, this is a fast road coming into and leaving the village. Car incidents will be high and make the whole area there a bottleneck for incidents and then delays/traffic.

But the more severe concern is the risk to child safety and a fatal accident will occur if families (or children on their own for school buses etc) cross here - even on a pedestrian crossing. This is a fast main road - cars do not stop at the other pedestrian crossing and zebra crossing further along the road despite the traffic at both sites there reducing in speed, as cars drive through village and observe speed camera. The lack of sight where the bend affects viewing the road ahead when leaving Danbury will mean cars are accelerating and not anticipating pedestrians in the road. It is a main road but looks

like a fast country road in both directions and with NO school or signs of a village / town at this location then cars do not drive with families crossing in mind. This is a terrible risk factor that will end in a tragedy as previously happened some years ago.

The houses are the wrong end of the village, families will not be close enough to the two local schools on foot or any of the main amenities.

The houses will not sell, when we moved here 5 years ago the major downside to our house on Hyde Lane was that we are the wrong end of the village! We went ahead buying a second car for us to have viable access to the school, doctors etc. They won't sell a '2 car needed home' and for anyone working in Chelmsford or needing to get to Chelmsford station they would be better to live in Maldon as it will take them the same time to drive in the morning traffic through Danbury and in Maldon they then have shops! We have no shops here and not a single shop/amenity or resource in the location planned.

This should never have been considered as a site for houses.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mr David Nichols (1360021)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mr David Nichols (1360021)

Comment ID DNP-109

Response Date 19/06/24 11:23

Status Processed

Submission Type Web

Version 0.3

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site B: Land at Tyndale Farm West

Question 2

Please add your comments below

The proposal for another 65 houses to be built outside of the village boundary is completely unacceptable. It is clear why developers want to build on this land - it is a prime location at the edge of the village, so they can charge a premium for their properties. This has nothing to do with providing affordable housing, it is just corporate greed. In light of the huge developments at Beaulieu Park, around Maldon and the proposal for Hammonds Farm the positive impact on the housing market would be negligible, whereas the damage to our village and local community cannot be underestimated. Why the Council would be prepared to compromise our beautiful village for this unnecessary housing estate is bizarre - anyone can see how overdevelopment has had such a huge negative impact on the roads and amenities in Maldon, yet we seem to be making the exact same mistakes.

Several applications have been made to build on this site over the years. They have all been rejected for a number of very clear reasons and nothing has changed since then. Why would we ignore the extensive discussions that have already taken place?

As a local resident my main concerns are the increased strain this development will place on our local schools and Doctors surgery. The road network is already at bursting point and this will only send more traffic through the centre of the village and the surrounding roads. It is already near-impossible to walk down (the single track) Hyde Lane without constantly jumping out of the way of cars and vans using it as a short-cut to avoid the traffic on the A414. It is only a matter of time until someone is injured,

and the last thing we need is even more vehicles on this road.
The location of this proposed site is entirely unsuitable for development.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mrs Helen Quill (1360023)
Email Address
Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation
Comment by Mrs Helen Quill (1360023)
Comment ID DNP-110
Response Date 19/06/24 11:42
Status Processed
Submission Type Web
Version 0.3

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site B: Land at Tyndales Farm West

Question 2

Please add your comments below

I strongly object to the development of this site. Danbury has already seen a huge increase in traffic through the village due to ever expanding developments in Maldon and Heybridge, another 65 houses on site plan B, land at Tyndale Farm West will further add to this burden, increasing noise and pollution. The position of this particular site will mean local lanes will be affected by traffic seeking to avoid build up on the A414 and ran runs will be created around narrow, mostly single track lanes. Arable farmland is valuable and making a contribution to food security. Doctor and Dental services in Danbury are already overstretched. This area is enjoyed by dog walkers and those who seek to enjoy green spaces. The footpath across this site is used every day. We should be protecting these areas, the wildlife there and their habitats.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mrs Hazel Green (1360056)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mrs Hazel Green (1360056)

Comment ID DNP-111

Response Date 19/06/24 11:55

Status Processed

Submission Type Web

Version 0.3

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site D: Danecroft, Woodhill Road

Question 2

Please add your comments below

I wish to object to the proposal for the building of 14 houses on site D (Danbury Neighbourhood Plan) Danecroft, Woodhill Road, Danbury for the following reason (see attached document for supporting information re objections):
DENSITY OF HOUSING

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

If you wish to submit any supporting information, please upload it here [Objection to Housing Site Allocation DNP1 Site D Danecroft re Density of Housing.pdf](#)

Housing Site Allocation DNP1 Site D Danecroft, Woodhill Road

I object to the proposal to build 14 houses on Site D, Danecroft Woodhill Road for the following reason:

DENSITY OF HOUSING

Site D is located within the Park neighbourhood which is described in the Danbury Neighbourhood Plan:

2.19

'The Park area has later 20th century housing with good sized gardens, woodland edges and greensward which sustain the rural character.'

2.20 signposts to the Danbury Design Guide:

'The Park Neighbourhood

Most housing around Danbury Country Park is 20th century and has a wide variety of design and size which contributes to an open and airy feel to the roads. Good sized gardens with trees, shrubs and hedges add to this character. The design exception is Beaumont Park which is a single style Neo-Georgian development with good size plots and open frontages. A central greensward edged with light woodland is for the benefit of residents. Well Lane is a busy lane with a Primary school and a small business park which offers employment for over 70 people. However, the woodland edges and greenswards continue the rural ambience, and variable street lighting sustains the rural character.'

The allocation of around 14 homes on this small site, surrounding a current dwelling, is a much higher density than the rest of the Park neighbourhood and therefore is in direct conflict with the Danbury Design Guide 2.2 Density and Views, which states:

'An area's prevailing character, setting and density should be respected'.

This attribute is given two orange diamonds, indicating that this is an **ESSENTIAL** consideration for development in the Park area.

The allocation of 14 properties to this site is therefore too high and this fact is further supported by:

DNP 3.6 which states that parking problems are already an issue within the village. No specific mention is made of this in the Site D policy, however the DNP requires parking on plot 'where possible'. Plot sizes would therefore be required to provide for at least 14 and, more likely, 28 cars. There is no adjacent parking available on Woodhill Road and, as car ownership increases a number of Southview Terrace residents currently park near the

junction of Woodhill Road and Southview Road. Any increase in this would be unsustainable. Parking for up to 28 cars within site D is therefore an essential consideration in the planning process as it impacts upon individual plot size and therefore density of development. Building 14 properties with adequate parking, whilst being, 'integrated with the landscape and existing housing' (**DNP 4.1**) is simply not possible, given the size of the D4 Danewood plot.

Site Specific Policy D:

5 This point states that existing trees (of which there are several large varieties within the plot) should be protected or ...'replaced with trees of the same value or better elsewhere on site, including some semi-mature.' Given the size of current trees, it would be impossible to either retain or replace trees, without impacting still further upon the issues of housing density outlined above. Without a TPO on any new or current trees, they could easily be removed by residents after building completion.

It is clear that the construction of 14 homes on this site does not meet the requirements of policies contained in the Danbury Neighbourhood Plan or in the accompanying Danbury Design Guide. A lower density development should be implemented in line with these requirements.

Comment

Consultee Mrs Hazel Green (1360056)
Email Address
Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation
Comment by Mrs Hazel Green (1360056)
Comment ID DNP-112
Response Date 19/06/24 12:03
Status Processed
Submission Type Web
Version 0.3

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Housing Site Allocation DNP1 Site D Danecroft, Woodhill Road

Question 2

Please add your comments below

I object to the proposed plan to build 14 houses on the DNP site D4 Danecroft for the following reason (please see attached supporting document).
HIGHWAYS ACCESS

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

If you wish to submit any supporting information, please upload it here [Objection to Housing Site Allocation DNP1 Site D Danecroft re Highways Access.pdf](#)

Housing Site Allocation DNP1 Site D Danecroft, Woodhill Road

I object to the proposal to build 14 houses on Site D, Danecroft Woodhill Road for the following reason:

HIGHWAY ACCESS

5.5a of DNP states that all sites should, 'Have satisfactory highway access'. Despite the mitigations proposed, the access road is onto a 40mph stretch of Woodhill Road with a difficult bend and limited visibility. Having lived in Southview Road for 20 years, I know how ever-more dangerous it already is to exit onto Woodhill Road, especially as this country lane is becoming increasingly used as a rat-run for cars avoiding A414. Access onto Woodhill Road from Site D does not therefore allow for safe or satisfactory highway access without some speed mitigation being implemented.

It is clear that the construction of 14 homes on this site does not meet the requirements of policies contained in the Danbury Neighbourhood Plan or in the accompanying Danbury Design Guide. Speed mitigation is required along Woodhill Road.

Comment

Consultee Mrs Hazel Green (1360056)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mrs Hazel Green (1360056)

Comment ID DNP-113

Response Date 19/06/24 12:14

Status Processed

Submission Type Web

Version 0.5

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site D: Danecroft, Woodhill Road

Question 2

Please add your comments below

I wish to object to the proposal to build 14 houses on site D4 of Danbury Neighbourhood Plan - Danecroft, Woodhill Road.
(please see attached supporting document).
BIODIVERSITY

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

If you wish to submit any supporting information, please upload it here [Objection to Housing Site Allocation DNP1 Site D Danecroft re Biodiversity.pdf](#)

Housing Site Allocation DNP1 Site D Danecroft, Woodhill Road

I object to the proposal to build 14 houses on Site D, Danecroft Woodhill Road for the following reason:

BIODIVERSITY

Site specific policy **D4** states that this site is “*formerly biodiverse*”.

In the “Assessment of Selected Sites against plan objectives December 22” referred to in DNP, the site was given a green environmental assessment for Presence of Protected Species, with a comment that the site does not contain protected species and the reason given as “no evidence seen on site visit”. However, a neighbour with a property boundary to site D has proof of the existence of dormice (a protected species) in this site boundary.

Before this site is given any further consideration, it is **ESSENTIAL** that a full-scale environmental study is undertaken to determine the existence of protected species on the site and appropriate mitigation actions taken prior to any development.

Given this evidence, a full-scale environmental study must be completed in order for the construction of any houses on this site to ensure the habitat of endangered species is not compromised.

Comment

Consultee Mr Max Campbell (1360100)
Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mr Max Campbell (1360100)

Comment ID DNP-115

Response Date 19/06/24 13:20

Status Processed

Submission Type Web

Version 0.5

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below General

Question 2

Please add your comments below

As a Danbury resident for my entire life, I have, fortunately, not seen too much development in Danbury. This proposal is unwelcome to myself and many other residents for a number of reasons. For one, Danbury lacks the infrastructure to support more homes, with only one major road through Danbury and many single track roads around it, traffic would be forced onto the backroads causing congestion and making roads unsafe for residents. Secondly, our beautiful green spaces and delicate ecosystems, many of which are SSSI sites, would be at risk of destruction due to higher footfall and further development. Danbury is a village worth preserving, with a rich history and quiet atmosphere. There are many other places nearby that land could be put aside for development which are far better placed for commuters and families. Please consider those.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee	Chelmsford City Council (1252951)
Email Address	planning.policy@chelmsford.gov.uk
Company / Organisation	Chelmsford City Council
Address	Civic Centre Duke Street Chelmsford CM1 1JE
Event Name	5. Danbury Neighbourhood Plan Reg 16 Consultation
Comment by	Chelmsford City Council (Chelmsford City Council - 1252951)
Comment ID	DNP-116
Response Date	19/06/24 15:17
Status	Processed
Submission Type	Web
Version	0.3

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below General

Question 2

Please add your comments below

Chelmsford City Council welcomes the opportunity to carry out formal consultation on the Submission Danbury Neighbourhood Plan. This meets its obligations under Regulation 16 of The Neighbourhood Planning (General) Regulations 2012.

The Council has worked closely with Danbury Parish Council and is pleased to have received the Submission Document and supporting information. Chelmsford City Council made informal comments at several stages of the Plan's development, and the formal Regulation 14 Consultation in March 2023. The Neighbourhood Plan Group is to be commended for its hard work. It identified key themes through community consultation and has thoroughly examined each of them leading to a range of policies to influence future development and areas for protection in the Parish.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mr Michael Priaulx (1360192)
Email Address swifts.planning@gmail.com
Company / Organisation Swifts Local Network: Swifts & Planning Group
Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation
Comment by Swifts Local Network: Swifts & Planning Group (Mr Michael Priaulx - 1360192)
Comment ID DNP-117
Response Date 19/06/24 15:26
Status Processed
Submission Type Web
Version 0.4

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below DNP6

Question 2

Please add your comments below

DNP6 is welcome, but it does not consider endangered urban wildlife such as red-listed bird species which inhabit buildings, nor propose biodiversity enhancement integrated into the buildings of new development, e.g. swift bricks, bat boxes and hedgehog highways.

Such species features are excluded from the national Biodiversity Net Gain metric.

In summary, therefore please add to the policy:

Swift bricks to be installed in new developments including extensions, in accordance with best practice guidance such as BS 42021 or CIEEM. Artificial nest cups for house martins may be proposed instead of swift bricks where recommended by an ecologist. Bat boxes and hedgehog highways to also be included where appropriate.

In more detail:

The reason for this is that bird boxes/ bricks and other species features are excluded from the DEFRA Biodiversity Net Gain metric, so require their own clear policy.

The Government's response in March 2023 to the 2022 BNG consultation stated that: "We plan to keep species features, like bat and bird boxes, outside the scope of the biodiversity metric... [and] allow local planning authorities to consider what conditions in relation to those features may be

appropriate" (page 27, https://consult.defra.gov.uk/defra-net-gain-consultation-team/technicalconsultation_biodiversitymetric/).

Swift bricks are the only type of bird box specifically mentioned as valuable to wildlife in national planning guidance, along with bat boxes and hedgehog highways (NPPG Natural Environment 2019 paragraph 023). The National Model Design Code Part 2 Guidance Notes (2021) also recommends bird bricks (Integrating Habitats section on page 25, and Creating Habitats section on page 26).

Swift bricks are considered a universal nest brick suitable for a wide range of small bird species including swifts, house sparrows and starlings (e.g. see NHBC Foundation: Biodiversity in New Housing Developments (April 2021) Section 8.1 Nest sites for birds, page 42:

https://www.nhbcfoundation.org/wp-content/uploads/2021/05/S067-NF89-Biodiversity-in-new-housing-developments_FINAL.pdf).

Swift bricks are significantly more beneficial than external bird boxes as they are a permanent feature of the building, have zero maintenance requirements, are aesthetically integrated with the design of the building, and have improved thermal regulation with future climate change in mind.

Therefore, swift bricks should be included in all developments following best-practice guidance (which is available in BS 42021:2022 and from CIEEM

(<https://cieem.net/resource/the-swift-a-bird-you-need-to-help/>)).

Natural England consider species features like swift bricks a building block of green infrastructure (e.g. see the table here: <https://naturalengland.blog.gov.uk/2023/11/08/green-infrastructure-creating-habitable-towns-and-cities-fit-for-the-future/>)

but this is not well known and therefore needs a clear policy.

The UK Green Building Council (UKGBC) is a membership-led industry network and they have produced a document entitled: "The Nature Recovery & Climate Resilience Playbook" (Version 1.0, November 2022) <https://ukgbc.org/resources/the-nature-recovery-and-climate-resilience-playbook/>

This document is designed to empower local authorities and planning officers to enhance climate resilience and better protect nature across their local area, and includes a recommendation (page 77) which reflects guidance throughout this document: "Recommendation: Local planning Authorities should introduce standard planning conditions and policies to deliver low cost/no regret biodiversity enhancement measures in new development as appropriate, such as bee bricks, swift boxes [and bricks] and hedgehog highways."

In addition to Neighbourhood Plans, many Local Authorities are including detailed swift brick requirements in their Local Plan, such as Wiltshire Local Plan Regulation 19 stage, which requires an enhanced number of 2 swift bricks per dwelling (policy 88: Biodiversity in the built environment, page 246 - "As a minimum, the following are required within new proposals: 1. integrate integral bird nest bricks (e.g. swift bricks) at a minimum of two per dwelling;"

<https://www.wiltshire.gov.uk/article/8048/Current-consultation-Reg-19>), and Cotswold District Council are proposing three swift bricks per dwelling in

their current Local Plan consultation (Policy EN8 item 6, and paragraph 0.8.4,

<https://www.cotswold.gov.uk/planning-and-building/planning-policy/local-plan-update-and-supporting-information/>), so such an enhanced level should also be considered.

Also:

Please add to the Neighbourhood Plan: Existing nest sites for building-dependent species such as swifts and house martins should be protected, as these endangered red-listed species which are present but declining in the parish return annually to traditional nest sites. Mitigation should be provided if these nest sites cannot be protected.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mrs Anne Jackson (1360006)
Email Address
Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation
Comment by Mrs Anne Jackson (1360006)
Comment ID DNP-118
Response Date 19/06/24 15:52
Status Processed
Submission Type Web
Version 0.5

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site B: Land at Tyndales Farm West

Question 2

Please add your comments below

Strongly object due to unnecessary expansion of village boundary when there is scope within the village to provide these properties. Particularly infill development. Lack of traffic infrastructure on an already dangerous A414 position. Valuable agricultural land being destroyed.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mr Craig Lane (1360564)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mr Craig Lane (1360564)

Comment ID DNP-119

Response Date 15/06/24 16:43

Status Processed

Submission Type Email

Version 0.6

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site D: Danecroft, Woodhill Road

Question 2

Please add your comments below

The Parish Council strongly objected and refused the proposal of 4 dwellings with detached garages in January 2010 (10/00102/out) and also refused an application in November 1989 of 14 detached houses with garages in this plot (89/1653).

This backland development outside the defined settlement represents creeping urbanisation and will detract from the rural character of the area contrary to Policy DC12.

The loss of habitat will have adverse effects on local wildlife, which includes deer, foxes, badgers, squirrels, bats and many species of birds, all of which are frequently situated on the proposed land. Danecroft also has a pond near which it is understood newts have been spotted. In addition I believe an underground stream has been detected there. There are several local springs and underground streams in the immediate vicinity.

The soak away is likely to be inadequate for 14 new houses, leading to an increased risk of flooding, especially if trees (several mature oaks) are removed to make way for development.

Danbury has many heritage assets, including a nearby underground tunnel starting at the house that used to be the 'Black Boy' alehouse (now Blackmore House). This is very close to the proposed vehicular access onto Woodhill Road.

The local doctors, Danbury Medical Centre, would have an increased number of patients, adding to the existing problems of obtaining doctor appointments. There would also be an increased pressure

on local school and other amenities.

Most of the above reasons have been cited by the Parish Council in 2010 when refusing only 4 houses to be built on the Danecroft land. The proposal of 14 houses would have a far greater detrimental impact for all of the above reasons. I do not understand how the rejection of 4 houses in 2010 can result in a proposal for 14 houses.

In summary, I strongly object to the development proposal and do not believe that it represents an improvement to the area in any way and it will disrupt the rural aspect of the area and put pressure on the infrastructure of Danbury.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mrs Karen Cooper (1356489)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mrs Karen Cooper (1356489)

Comment ID DNP-120

Response Date 15/06/24 17:12

Status Processed

Submission Type Email

Version 0.3

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site D: Danecroft, Woodhill Road

Question 2

Please add your comments below

The Parish Council strongly objected and refused the proposal of 4 dwellings with detached garages in January 2010 (10/00102/out) and also refused an application in November 1989 of 14 detached houses with garages in this plot (89/1653).

This backland development outside the defined settlement represents creeping urbanisation and will detract from the rural character of the area contrary to Policy DC12.

The loss of habitat will have adverse effects on local wildlife, which includes deer, foxes, badgers, squirrels, bats and many species of birds, all of which are frequently situated on the proposed land. Danecroft also has a pond near which it is understood newts have been spotted. In addition I believe an underground stream has been detected there. There are several local springs and underground streams in the immediate vicinity.

The soak away is likely to be inadequate for 14 new houses, leading to an increased risk of flooding, especially if trees (several mature oaks) are removed to make way for development.

The increase in traffic at a junction, near a blind bend, which already presents problems is contrary to Policy DC43. Since 2010 there has been a great deal more traffic travelling along Woodhill Road; the new development will present significantly more traffic and the risk of accidents.

There will be a loss of visual amenity and privacy of neighbouring residents in contrary to Policy DC4, especially as the land rises towards the proposed development sites.

Danbury has many heritage assets, including a nearby underground tunnel starting at the house that used to be the 'Black Boy' alehouse (now Blackmore House). This is very close to the proposed vehicular access onto Woodhill Road.

The local doctors, Danbury Medical Centre, would have an increased number of patients, adding to the existing problems of obtaining doctor appointments. There would also be an increased pressure on local school and other amenities.

Most of the above reasons have been cited by the Parish Council in 2010 when refusing only 4 houses to be built on the Danecroft land. The proposal of 14 houses would have a far greater detrimental impact for all of the above reasons. I do not understand how the rejection of 4 houses in 2010 can result in a proposal for 14 houses.

In summary, I strongly object to the development proposal and do not believe that it represents an improvement to the area in any way and it will disrupt the rural aspect of the area and put pressure on the infrastructure of Danbury.

Comment

Consultee Lisa Braben (1360567)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Lisa Braben (1360567)

Comment ID DNP-121

Response Date 18/06/24 21:57

Status Processed

Submission Type Email

Version 0.3

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site B: Land at Tyndales Farm West

Question 2

Please add your comments below

I object to any development on site plan B, Tyndale Farm West, Chelmsford. There has been so much house building in Maldon the Danbury main road cannot cope with any more developments such as the proposed one detailed above. There would be dreadful impacts on the wildlife as well as the environment.

Comment

Consultee Ms Hazel Moore (1359689)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Ms Hazel Moore (1359689)

Comment ID DNP-122

Response Date 17/06/24 23:58

Status Processed

Submission Type Email

Version 0.5

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Policy DNP1: Housing Site Allocations

Question 2

Please add your comments below

This site has been allocated for around 14 new homes. However 14 homes on this site is a much higher density than the rest of the Park neighbourhood in which it is located which is in contravention of Policy DNP5 (8) in the Danbury Neighbourhood Plan and also to an ESSENTIAL consideration in the Danbury Design Guide, as set out below:

2.19 of the Neighbourhood Plan describes

“The Park area has later 20th century housing with good sized gardens, woodland edges and greensward which sustain the rural character.”

2.20 signposts to the Danbury Design Guide (supporting document A) for more details.

The Danbury Design Guide describes this neighbourhood as:

The Park Neighbourhood

Most housing around Danbury Country Park is 20th century and has a wide variety of design and size which contributes to an open and airy feel to the roads. Good sized gardens with trees, shrubs and hedges add to this character. The design exception is Beaumont Park which is a single style Neo-Georgian development with good size plots and open frontages. A central greensward edged with light woodland is for the benefit of residents. Well Lane is a busy lane with a Primary school and a small business park which offers employment for over 70 people. However, the woodland edges and greenswards continue the rural ambience, and variable street lighting sustains the rural character

In the Danbury Design Guide 2.2 Density and Views says

“An area’s prevailing character, setting and density should be respected”.

This attribute is given two orange diamonds, indicating that this is an ESSENTIAL consideration for development in the Parks area.

DNP5: Street Scene says

(8) splitting of gardens and back land developments should be avoided as both destroy the open contribution these make in all 6 of Danbury’s main residential localities

However site D14 Danecroft contemplates the splitting of a garden and back land development and is in direct contravention of this policy.

It is therefore clear that 14 homes on this site does not meet the requirements of policies contained in the Danbury Neighbourhood Plan or in the accompanying Danbury Design Guide, and a lower density development should be implemented.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Ms Hazel Moore (1359689)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Ms Hazel Moore (1359689)

Comment ID DNP-123

Response Date 17/06/24 23:58

Status Processed

Submission Type Email

Version 0.3

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site D: Danecroft, Woodhill Road

Question 2

Please add your comments below

Site D: Danecroft, Woodhill Road

(1)

Says that main vehicular access to the site will be from Woodhill Road.

I note that this section of Woodhill Road is already dangerous at certain times of day, when cars "ratrun" along this stretch, often speeding above the 40mph limit. The road bends and visibility is limited, making entry/exit from South View Road difficult. Similar problems will be encountered from Danecroft.

I believe more traffic mitigation is required, eg reducing the speed limit or putting in traffic calming measures.

(4) says that this site is "formerly biodiverse".

In the "Assessment of Selected Sites against plan objectives December 22" (accompanying document 27) the site was given a green environmental assessment for Presence of Protected Species, with a comment that the site does not contain protected species and the reason given as "no evidence seen on site visit". However I own the neighbouring property and I have found evidence of hibernating dormice on my property, in the boundary that both sites share with the church field.

I believe it is ESSENTIAL that a proper environmental study is undertaken to determine whether there are protected species present on the site and appropriate mitigation actions taken prior to any development

Additional site specific considerations:

There is no mention of parking in the site specific policies, although Policy DNP5: Street (4) says provide parking on plot where possible.

It is essential that any development within Danecroft must contain adequate parking, as there is already a problem on South View Road with numerous cars parked along the end of the road near to the junction with Woodhill Road, which can cause issues with entering and exiting South View Road. South View Road cannot sustain any further on-road parking.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Ms Hazel Moore (1359689)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Ms Hazel Moore (1359689)

Comment ID DNP-124

Response Date 17/06/24 23:58

Status Processed

Submission Type Email

Version 0.4

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below DNP5: Street Scene

Question 2

Please add your comments below

DNP5: Street Scene

(8) splitting of gardens and back land developments should be avoided as both destroy the open contribution these make in all 6 of Danbury's main residential localities

Site D14 Danecroft contemplates the splitting of a garden and back land development and is in direct contravention of this policy.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mr Patrick Heaphy
(1360641)
Email Address
Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation
Comment by Mr Patrick Heaphy (1360641)
Comment ID DNP-125
Response Date 18/06/24 08:09
Status Processed
Submission Type Email
Version 0.5

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site D: Danecroft, Woodhill Road

Question 2

Please add your comments below

I am writing to formally object to a section within the Danbury Neighbourhood Plan, proposing the building and construction of 14 new homes on the land at Danecroft, Woodhill Road, which is situated behind my property at 7a South view Road.

My objections are based on the following concerns:

1. Overlooking and loss of privacy: the proposed development will result in significant overlooking into my property, leading to a substantial loss of privacy for my family and me. The height of the new houses, proposed at a maximum of two stories in the DNP will allow direct views into our living spaces and garden.

This is expected to be the case as all evidence in the DNP points to the intense massing at our corner of Danecroft to satisfy the criteria in the DNP, which I have expanded on in point 3, increased density and massing.

2. Visual amenity: the new development will negatively impact the visual amenity of the area. The current view from, which is characterised by open space and greenery, will be replaced by a dense and visually intrusive rows of houses.

This has already been a point of justification for refusal to application number 89/1653 (Appendix 1 & 2) for 14 new houses, as covered in the following points:

- Point 1. "Further the development would prejudice the open character of the countryside."

- Point 2. "The proposal which is located within the Chelmer-Blackwater Ridges Special Landscape Area, would be contrary to the above policies in that it would lead to the encroachment of urban development to the detriment of the open character of the countryside."

- Point 3. "The size and shape of the site would not permit development of a standard compatible with that in the area and in consequence the proposal would be detrimental to the visual amenities of the area."

Additionally, this was also the basis of points to refuse application number 10/00102/OUT (Appendix 3 & 4) for 4 new houses, as covered by the following point:

- Point 1. "The application site is located within the rural area, beyond the Defined Settlement boundary of Danbury and as such the proposal for new residential development is unacceptable in principle.

The application therefore fails to comply with Policy CP5."

3. Increased density and intense massing: The proposal to build 14 houses on this land represents an overdevelopment of the site and will lead to intense massing; The scale and bulk of the proposed houses are not in keeping with the surrounding area. The intense massing will dominate the landscape and be out of character with the existing neighbourhood, which consists primarily of well-spaced homes. The increased density and increased massing towards one area of the Danecroft plot will be driven by the criteria that must be satisfied in the DNP.

- Housing is to be positioned away from the properties on the south of Danecroft along Woodhill Road, meaning the new houses will have an increased density on the North of the Danecroft plot – please refer to Figure 1.

Figure 1: Extract from the Danbury Neighbourhood Plan (See attachment)

- Additionally, considerations during planning of housing layout are to be given to neighbouring listed building and conservations areas which are located on the Eastern / North Eastern part of the Danecroft plot. This will lead to significant increased massing to the North Western part of the Danecroft plot also in line with the point above. Please refer to Figure 2:

Figure 2: Extracts from the Danbury Neighbourhood Plan (See attachment)

These mitigations and criteria that must be adhered to, will clearly increase the density and massing of the new homes to the extent that is significantly worse than the previously rejected planning applications.

4. Noise and Disruption: The construction process and the subsequent increase in residents will lead to heightened levels of noise and disruption. This will significantly affect the peace and quiet currently enjoyed by the residents of the surrounding properties.

Additionally, as I currently work from home in the room at the rear of my property, any construction work will impact the ability for me to carry out my work – as a minimum, considerations should be taken into place for restrictions on limiting the times for building works.

5. Character of the Surrounding Area: The proposed development does not align with the character of the surrounding area. The architectural style and density are incompatible with the existing properties, which will detract from the neighbourhood's aesthetic and cultural value.

I have evidenced in my previous points whereby these were contributing factors for a rejection to a previous planning application for development of new homes on Danecroft.

6. Loss of Trees: taking into consideration the massing of housing mentioned in the points above, there is no doubt that to facilitate the proposed development, a number of mature trees will have to be removed. Whilst the DNP does have a criterion that any mature trees should be replaced with semi-mature trees, which will have an initial detrimental impact on local wildlife and the environment. These trees provide essential habitat for birds and other species, and their loss will reduce biodiversity and the natural beauty of the area. Furthermore, the trees being removed to facilitate the housing will most likely be the ones that are on view from my property and garden.

I urge you to consider these points carefully and reject the planning application for the reasons outlined above.

Thank you for taking my concerns into account.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

If you wish to submit any supporting information, please upload it here [DNP-125 Mr Patrick Heaphy - Attachment.pdf](#)

Dear Chelmsford Council,

I am writing to formally object to a section within the Danbury Neighbourhood Plan, proposing the building and construction of 14 new homes on the land at Danecroft, Woodhill Road, which is situated behind my property at 7a South view Road.

My objections are based on the following concerns:

1. Overlooking and loss of privacy: the proposed development will result in significant overlooking into my property, leading to a substantial loss of privacy for my family and me. The height of the new houses, proposed at a maximum of two stories in the DNP will allow direct views into our living spaces and garden.

This is expected to be the case as all evidence in the DNP points to the intense massing at our corner of Danecroft to satisfy the criteria in the DNP, which I have expanded on in point 3, increased density and massing.

2. Visual amenity: the new development will negatively impact the visual amenity of the area. The current view from, which is characterised by open space and greenery, will be replaced by a dense and visually intrusive rows of houses.

This has already been a point of justification for refusal to application number 89/1653 (*Appendix 1 & 2*) for 14 new houses, as covered in the following points:

- Point 1. *“Further the development would prejudice the open character of the countryside.”*
- Point 2. *“The proposal which is located within the Chelmer-Blackwater Ridges Special Landscape Area, would be contrary to the above policies in that it would lead to the encroachment of urban development to the detriment of the open character of the countryside.”*
- Point 3. *“The size and shape of the site would not permit development of a standard compatible with that in the area and in consequence the proposal would be detrimental to the visual amenities of the area.”*

Additionally, this was also the basis of points to refuse application number 10/00102/OUT (*Appendix 3 & 4*) for 4 new houses, as covered by the following point:

- Point 1. *“The application site is located within the rural area, beyond the Defined Settlement boundary of Danbury and as such the proposal for new residential development is unacceptable in principle. The application therefore fails to comply with Policy CP5.”*

3. Increased density and intense massing: The proposal to build 14 houses on this land represents an overdevelopment of the site and will lead to intense massing; The scale and bulk of the proposed houses are not in keeping with the surrounding area. The intense massing will dominate the landscape and be out of character with the existing neighbourhood, which consists primarily of well-spaced homes.

The increased density and increased massing towards one area of the Danecroft plot will be driven by the criteria that must be satisfied in the DNP.

- Housing is to be positioned away from the properties on the south of Danecroft along Woodhill Road, meaning the new houses will have an increased density on the North of the Danecroft plot – please refer to Figure 1.

Figure 1: Extract from the Danbury Neighbourhood Plan

6. Housing and windows should be positioned with regard to the slope of the site to avoid overlooking neighbouring gardens and windows, especially to the South along the Woodhill Road.

- Additionally, considerations during planning of housing layout are to be given to neighbouring listed building and conservations areas which are located on the Eastern / North Eastern part of the Danecroft plot. This will lead to significant increased massing to the North Western part of the Danecroft plot also in line with the point above. Please refer to Figure 2:

Figure 2: Extracts from the Danbury Neighbourhood Plan

2. Pre-application advice should be sought from Historic England to reduce the risks and therefore preserve and where appropriate enhance the setting of the neighbouring listed buildings and adjacent Conservation area.

- Strong mitigation will protect any adverse effects to the grade II listed Cricketers Arms and Poplars through high quality design & layout including biodiversity enhancement.

These mitigations and criteria that must be adhered to, will clearly increase the density and massing of the new homes to the extent that is significantly worse than the previously rejected planning applications.

4. Noise and Disruption: The construction process and the subsequent increase in residents will lead to heightened levels of noise and disruption. This will significantly affect the peace and quiet currently enjoyed by the residents of the surrounding properties.

Additionally, as I currently work from home in the room at the rear of my property, any construction work will impact the ability for me to carry out my work – as a minimum, considerations should be taken into place for restrictions on limiting the times for building works.

5. Character of the Surrounding Area: The proposed development does not align with the character of the surrounding area. The architectural style and density are incompatible with the existing properties, which will detract from the neighbourhood's aesthetic and cultural value.

I have evidenced in my previous points whereby these were contributing factors for a rejection to a previous planning application for development of new homes on Danecroft.

6. Loss of Trees: taking into consideration the massing of housing mentioned in the points above, there is no doubt that to facilitate the proposed development, a number of mature trees will have to be removed. Whilst the DNP does have a criterion that any mature trees should be replaced with semi-mature trees, which will have an initial detrimental impact on local wildlife and the environment. These trees provide essential habitat for birds and other species, and their loss will reduce biodiversity and the natural beauty of the area. Furthermore, the trees being removed to facilitate the housing will most likely be the ones that are on view from my property and garden.

I urge you to consider these points carefully and reject the planning application for the reasons outlined above.

Thank you for taking my concerns into account.

Yours sincerely,

Patrick Heaphy

CHELMSFORD BOROUGH COUNCIL



TOWN AND COUNTRY PLANNING ACT 1971
Town and Country Planning General Development Order 1988

APPLICATION NO: CHL/1653/89(1) 38 N DATE RECEIVED: 19/09/89

APPLICANT: Mr & Mrs G King
Danecroft
Woodhill Road
Danbury
Essex

AGENT: Martin, Peters & Newman
119 High Street
Southend on Sea
Essex
SSI 1LH

DESCRIPTION: **OUTLINE** - 14 detached houses and garages

LOCATION: Danecroft, Woodhill Road, Danbury

PARISH: Danbury

DRAWING NO: 076.89.02B

The Council has given consideration to the application and plans as specified above, and hereby give notice of its decision to **REFUSE PERMISSION** for the following reasons:-

REASONS

- 1 In the adopted Chelmsford Rural Areas Local Plan the site lies within the Rural Area beyond the Green Belt. The Essex Structure Plan, as approved by the Secretary of State states, at Policy S.10, that:-
"Within the Rural Areas not included in the Green Belt, the open countryside will be protected from development and the existing uses of land shall remain, for the most part, undisturbed. Permission will not normally be given for development in the Rural Areas unless the proposals are related to agriculture, mineral extraction or forestry or are for other forms of development which must take place in the Rural Areas. Dwellings for agricultural workers may be permitted in conjunction with farms if it can be shown that the worker must be resident on the agricultural holding. Any development which is permitted shall be of a scale, design and siting that the appearance of the countryside is not impaired."
The application as submitted provides insufficient justification to warrant a departure from the above policy in that the proposed development is not related to any activity, use or purpose which must by necessity be located in the Rural Area beyond the Green Belt. Further the development would prejudice the open character of the countryside.

Contd

Civic Centre,
Duke Street,
Chelmsford CM1 1JZ.

Dated 28 NOV 1989

Signed

W. A. Blythdale

Director of Planning

CHL/1653/89 Contd

- 2 The site lies within a Special Landscape Area in the adopted Chelmsford Rural Areas Local Plan. Policy 66 of the Plan states:-
 "The Special Landscape Areas are defined on the Proposals Map. Within these areas Policy NR12 of the Structure Plan will apply."
 The Essex Structure Plan, as approved by the Secretary of State, states at Policy NR.12 that:
 "Within Special Landscape Areas, in addition to other policies set out elsewhere in this statement, there will be a presumption against development unless its location, siting, design, materials and landscaping accord with the character of the area in which the development is proposed."
 The proposal, which is located within the Chelmer-Blackwater Ridges Special Landscape Area, would be contrary to the above policies in that it would lead to the encroachment of urban development to the detriment of the open character of the countryside.
- 3 The size and shape of the site would not permit development of a standard compatible with that existing in the area and in consequence the proposal would be detrimental to the visual amenities of the area.
- 4 The proposal, if permitted, would be a precedent for further development of a similar nature elsewhere in the locality, contrary to the Local Planning Authority's policy for this area.
- 5 The formation of an estate road junction will give rise to slowing, turning and manoeuvring movements of vehicles on this section of Woodhill Road where visibility is restricted by the alignment of the road, thereby causing a deterioration in highway safety.

Appendix 2: Rejected housing layout plan 1653/89.





TOWN AND COUNTRY PLANNING ACT 1990
Town and Country Planning (General Development Procedure) Order 1995

Agent:

Turley Associates
25 Savile Row
London
W1S 2ES

Applicant:

Blenheim Consultancy Services
Limited
C/o Agent

REFUSAL OF OUTLINE PLANNING PERMISSION

LOCATION: Danecroft Woodhill Road Danbury Chelmsford Essex
CM3 4DY

PROPOSAL: Construction of four detached dwellings with garages and associated landscaping.

APPLICATION NO: 10/00102/OUT

DATE RECEIVED: 22 January 2010

DRAWING NO(s): 09/04/01/A; 09/04/02/A; 09/04/03/; 09/04/05/; DESIGN AND ACCESS STATEMENT/; PLANNING STATEMENT/; ECOLOGICAL ASSESSMENT/; LANDSCAPE & VISUAL ASSESSMENT/;

The Council has given consideration to the application and plans as specified above, and hereby gives notice of its decision to **REFUSE OUTLINE PLANNING PERMISSION** for the following reasons:-

- 1 Core Strategy Policy CP5 seeks to contain urban growth by defining the physical limit of the urban areas of Chelmsford, South Woodham Ferrers and the Defined Settlements. Within the rural areas of the Borough beyond the Metropolitan Green Belt as defined on the Proposals Map, the Borough Council will protect and enhance the character and openness of the countryside. This will be achieved by the restriction of inappropriate development in a rural area. Planning permission for development within the rural areas will be refused other than for the categories of development expressly identified in the relevant Core and Development Control policies.

The application site is located within the rural area, beyond the Defined Settlement boundary of Danbury and as such the proposal for new residential development is unacceptable in principle. The application therefore fails to comply with Policy CP5.

- 2 Development Control Policy DC2 seeks specifically to control development in the countryside beyond the Metropolitan Green Belt and states that within the rural area the countryside will be protected for its own sake, particularly for its landscapes, natural resources and areas of ecological, historic, archaeological, agricultural and recreational value. Planning permission will be refused for development within the rural area except for where the proposal is for one of a number of prescribed purposes. The provision of new dwellings for private use is not one of these prescribed purposes and as such the proposal fails to comply with Policy DC2.

The Development Plan policies taken into account in deciding this application are listed below. The full text of the policies may be inspected at the Council's offices.

CP4	Core Policy CP4 - Securing Infrastructure - The Council will require, through the use of planning contributions, that all new development meets the necessary on and off-site infrastructure requirements required to support the development and mitigates the impact of that development on existing community interests. Standard charges and/or standard formulae, as appropriate, will be imposed for payment of financial contributions towards infrastructure, works or facilities.
CP5	Core Policy CP5 Containing Urban Growth - Urban growth will be contained by defining the physical limit of the urban areas of Chelmsford and South Woodham Ferrers and the Defined Settlements.
DC2	Development Control Policy DC2 Controlling Development in the Countryside Beyond the Metropolitan Green Belt - The control of development will be achieved by the restriction of new uses to those appropriate to a rural area.
DC4	Development Control Policy DC4 Protecting Existing Amenity - All development proposals should safeguard the amenities of the occupiers of any nearby properties by ensuring that development would not result in excessive noise, activity or vehicle movements, overlooking or visual intrusion and the built form would not adversely prejudice outlook, privacy, or light enjoyed by the occupiers of nearby properties.
DC7	Development Control Policy DC7 Vehicle Parking Standards at Developments - All development will be required to comply with the Borough Council's vehicle parking standards which include maximum vehicle parking standards for residential and non-residential uses.
DC17	Development Control Policy DC17 Conservation Areas - Sets the criteria for development proposals in Conservation Areas which must preserve or enhance the character or appearance of the Conservation Area.
DC24	Development Control Policy DC24 Energy Efficient Design and Use of Materials - Planning permission will not be granted for development which fails to meet standards relating to the Code for Sustainable Homes and BREEAM standards, a reduction in carbon emissions and the use of sustainable and/or recycled materials, and impact on amenity.
DC40	Development Control Policy DC40 Public Open Space for New Residential Developments - Outlines requirements for provision and, where appropriate, commuted sum payments.

DC42	Development Control Policy DC42 Site Planning - Planning permission will be granted for development proposals where the site planning and design of building spaces arranges access points, routes within the site, public and private spaces, building forms and ancillary functions in an efficient, safe, workable, spatially coherent and attractive manner, incorporates existing site features of value and does not cause unacceptable effects on adjoining sites, property or their occupiers.
DC44	Development Control Policy DC44 Private Amenity Space - All new dwellings will be required to have a high degree of privacy and the use of private garden space appropriate for the type of dwelling and its location.
DC45	Development Control Policy DC45 Achieving High Quality Development - Sets the criteria for the circumstances which will prevail in order to achieve high quality development for both new buildings and extensions.

Date: 19 March 2010

Signed:

DAVID GREEN
Director of Sustainable Communities

IMPORTANT - YOUR ATTENTION IS DRAWN TO THE NOTES ATTACHED

Appendix 4: Rejected housing layout plan, 10/00102/OUT



Comment

Agent Olivia James (1329178)

Email Address

Company / Organisation Pegasus Group

Address (1329320)

Consultee Stonebond (Chelmsford) Ltd.

Email Address

Company / Organisation

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Stonebond (Chelmsford) Ltd. (- 1329320)

Comment ID DNP-126

Response Date 18/06/24 14:01

Status Processed

Submission Type Email

Version 0.4

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below General

Question 2

Please add your comments below

Please see attached letter

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

If you wish to submit any supporting information, please upload it here [P22-2364 - Danbury Regulation 16 NP Representations - Stonebond - 18.06.24.pdf](#)

18th June 2024

Danbury NP Consultation, c/o Spatial Planning Policy Team
Chelmsford City Council
Civic Centre
Duke Street
Chelmsford
CM1 1JE

Dear Sir/Madam

Representations to the Submission Danbury Neighbourhood Plan Consultation under Regulation 16 of the Neighbourhood Planning (General) Regulation, 2012 (as amended)

These Representations are submitted by Pegasus Group on behalf of Stonebond (Chelmsford) Ltd. (Stonebond) in response to the Danbury Neighbourhood Plan (DNP) Regulation 16 Consultation (8th May – 19th June 2024). This response has been provided with due consideration of the consultation document (Submission Plan – March 2024) and its supporting material.

Our client previously submitted Representations to the Regulation 14 consultation held between February and March 2023 by Danbury Parish Council, which have been appended to this letter. The comments made within the previous Representations remain and should, therefore, be referred to alongside this submission. Stonebond has been in discussions with Danbury Parish Council/Neighbourhood Plan Steering Group since 2020 in respect of "Land at Mill Lane" and its potential for delivering residential development (up to 30 dwellings) of varying sizes and tenures as well as an area for recreational or ecological/biodiversity uses for public benefit, to support the aims and objectives of the Neighbourhood Plan. Full details of the Site are provided in the Vision Document also appended to these Representations.

It is acknowledged that some minor amendments have been made to the Submission Plan in line with comments received in response to the Regulation 14 consultation. It is, however, contended that further updates are required as detailed below and in the previous Representations (Regulation 14) in order for the Plan to meet the requirements of the National Planning Policy Framework (2023 – 'the Framework') and ultimately the Basic Conditions of Schedule 4B of the Town and Country Planning Act 1990. These amendments relate principally to the proposed approach to the allocation of sites and the need to provide greater flexibility and scope for development to come forward in the Plan period, in order to meet local community needs, addressing the social, economic and environmental elements of sustainable development detailed at paragraph 8 of the Framework.

Suite 4, Pioneer House, Vision Park, Histon, Cambridge, CB24 9NL
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Offices throughout the UK.

Pegasus Group is a trading name of Pegasus Planning Group Limited (20227000) registered in England and Wales.
Registered Office: 35 Sheep Street, Gloucester, Gloucestershire, GL1 1RQ

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DESIGN | ECONOMICS | ENVIRONMENT | HERITAGE | LAND & PROPERTY | PLANNING | TRANSPORT & INFRASTRUCTURE



Neighbourhood Plan Promotion Background

The Danbury Neighbourhood Plan (DNP) working group consulted with Essex County Council (ECC) highways on potential sites for allocation within the Neighbourhood Plan (NP) following their Call for Sites Consultation.

ECC reviewed the site at Mill Lane and formally responded stating that they did not consider the wider local highway network (Mill Lane, The Avenue and Hyde Lane) was suitable to accommodate the additional trips associated with the development.

Our client's appointed transport consultant (Cannon Consulting Engineers – CCE) prepared a Technical Note to seek to address these concerns. CCE and Stonebond met with ECC (in April 2021) to discuss the note, where ECC explained they had the following concerns:

- Footway Link – they consider the existing footway links are too narrow and would discourage walking leading to more car trips.
- Highway Links – they consider that Mill Lane, The Avenue and Hyde Lane are too narrow and have limited passing opportunities to support an additional 30 dwellings.

However, they may support a development of between 6 and 10 dwellings. Subsequently CCE have assessed the existing footway provision and the existing carriageway provision along the lanes.

In addition, an updated Vehicle Impact Assessment has been carried out to seek to address ECC's concerns and to demonstrate that the potential development will not result in a severe impact on the local network in terms of capacity or safety.

Working alongside CCE, Stonebond submitted two technical notes to ECC Highways and on 22nd July 2021 received the following confirmation from, Hilary Gore, Strategic Development Manager (Essex County Council Highway):

"Having considered the two technical notes and the discussed the highway matters at pre-app meetings, I still have some concerns about the implication of 30 dwellings in Mill Lane. However, should the access be from Millfields to encourage vehicular traffic to turn left out of the site and a package of mitigation measures be provided in association with any development then I would consider amending my recommendation to Danbury Parish Council. This would be on the basis of an absolute maximum of 30 dwellings, with a mitigation package of:

- Access from Millfields.
- Footway enhancements as identified in Technical Note 2 plus further provision of footway widening in Mill Lane where it can be achieved within the existing highway limits.
- Possible contribution to CCC towards maintenance of vegetation to increase available footway widths.
- Enhancement/creation of passing places (or widening) in Mill Lane south of Millfields and in Hyde Lane south, details to be agreed at application stage.



- *Traffic management measures to discourage vehicular traffic from using Mill Lane north-west which is a protected lane, and Hyde Lane/Mill Lane south.*

I hope this is helpful. Please can you confirm that this would be acceptable to your client before I let the Parish Council know about the outcome of our discussions."

Stonebond have met with the Danbury Neighbourhood Steering Group expressing that they are happy to continue working with the Group and will continue to promote the Site through the Neighbourhood Plan process.

Review of Danbury Neighbourhood Plan

Sustainable Growth at Danbury

Chelmsford City Council's (CCC) adopted Local Plan (LP) (2020) outlines at *Strategic Growth Site Policy 13 – Danbury* the requirement for "an allocation of around 100 new homes to be accommodated within or adjoining the Defined Settlement Boundary of Danbury." As part of the Council's review of the LP, their recently published Preferred Options Consultation LP (May 2024) retains this policy and the number of homes to be allocated in the village which are to "be identified and consulted upon through the emerging Danbury Neighbourhood Plan." Nevertheless, the DNP identifies 5 sites for allocation which are claimed to be capable of delivering 93 dwellings. It is assumed that the remaining balance of circa 7 dwellings is to come forwards as windfall development, however, the NP is unclear on this point. Our client remains concerned about this approach as detailed within our response to *Policy DNPI* and further elaborated upon within the Regulation 14 Representations appended to this letter.

The landscape, ecology and highway constraints affecting Danbury are acknowledged, however, there continue to be other development opportunities above those sites allocated adjoining the defined settlement boundary, which could come forwards with appropriate mitigation so as to limit any impact upon these. Thereby, providing sustainable options for accommodating the growth which the village should be afforded owing to its status as a Key Service Settlement outside of the Green Belt. As detailed in the adopted LP (2020), Danbury benefits from a "good level of services including primary schools, early years and childcare provision, convenience shopping facilities and primary healthcare facilities." The inherent sustainability of the village as a location for growth is further highlighted within the Vision Document appended to this letter.

The Parish Council should, therefore, explore the opportunity to positively direct development in sustainable locations within the village through *Policy DNPI* and the NP more broadly. This would, ensure the vitality and viability of Danbury through the delivery of new market/affordable homes and opportunities for the expansion/enhancement of business and community facilities including upgrading and enhancements of existing infrastructure through the Plan period and beyond. Thereby aligning with the Framework's overarching aim, the delivery of sustainable development, addressing the economic, social and environmental objectives outlined at paragraph 8. Failure to do so will result in the NP not meeting Basic Conditions a and d, and by not identifying a sufficient amount and variety of land to come forward, the NP will conflict with the Government's aspiration



of significantly boosting the supply of homes (Framework – paragraph 60). Including “Land at Mill Lane” as an allocation would allow the Neighbourhood Plan to set the agenda for growth in a sustainable location which is capable of accommodating this proportionate expansion to the village.

The following Representations have been set out under the sections/policies outlined within the submission Neighbourhood Plan (March 2024).

Section 5: Housing and Development

Our client continues to agree with the overall objective outlined in respect of housing development “to ensure there is a mix of house types, size and high-quality housing provision for all ages, which meets the housing needs of Danbury. It will also be appropriate to the scale and nature of the Parish, with the distinct and separate identity of Danbury retained. Green energy in new developments will be encouraged.” Nonetheless, as contended within our client’s previous Regulation 14 Representations, despite the updates which have since been made, it is considered that a series of amendments are necessary to ensure the above objective/vision can be met, and the Plan be sufficiently flexible to positively guide development across the Plan period.

Policy DNP1: Housing Site Allocations

The comments made during Regulation 14 Representations remain valid in relation to *Policy DNP1* given that no amendments have been made to the housing target or site allocations. Our client wishes to continue to raise their concern over the housing target identified, the deliverability/achievability of the sites allocated as well as the approach/methodology to selecting these allocations. Therefore, please refer to **paragraphs 3.4–3.17 of the appended Regulation 14 Representations** for a detailed response in respect of this policy. These paragraphs outline how *Policy DNP1* is not adequately justified and as currently worded would be contrary to the Framework’s overarching aims and approach to growth demonstrated by its presumption in favour of sustainable development and, therefore, does not meet with Basic Conditions a, d and e of Schedule 4b of the Town and Country Planning Act 1990 (as amended).

Policy DNP2: Housing type, mix and tenure

It is noted that *Policy DNP2* has been amended in respect of the requirements previously outlined for affordable housing provision which applied to developments of ten or more homes. The previous percentage requirements listed (35% affordable homes) have been removed and it is now unclear as to the NP’s approach to affordable housing and indeed tenure split. *Policy DNP2* states that “new development of 10 or more homes will be supported where the size and mix of the dwellings are consistent with the adopted Local Plan (*Policy DM1*).” Adopted CCC LP *Policy DM1* relates to the size and type of dwellings, whilst *Policy DM2* details the affordable housing split required for developments. Therefore, if the percentage requirements are to be removed from *Policy DNP2* then the accurate references to LP policies need to be provided or alternatively the need for developments to accord with adopted Local Planning policy should be specified.



All other comments which were made within the **Regulation 14 Representations** submitted by our client remain valid and should, therefore, be reviewed in full (**paragraphs 3.22 – 3.25**). These relate to the under delivery of much needed affordable housing, which will result from the NP's current approach to the allocation of sites, their deliverability and their size in terms of meeting the threshold for affordable housing provision as currently outlined in the adopted LP (*Policy DM2 – 11* or more dwellings). As such the previous appended Representations concluded that there is a need to identify further sites for allocation and that it will be important to ensure these are of a sufficient size to meet with local affordable housing threshold requirements. The allocation of further qualifying sites such as "*Land at Mill Lane*" would assist the Parish with meeting the affordable housing need identified in the village and wider city area (Danbury Housing Needs Assessment (2020)); ensuring the delivery of much needed on-site affordable housing tailored to the needs of the community in line with draft *Policy DNP2*.

10. Heritage

Policy DNP17 Protected Lanes

It is acknowledged that the wording of *Policy DNP17 Protected Lanes* has been amended since the Regulation 14 NP (formerly Policy DNP21) in response to comments made. Nevertheless, it is considered that the wording of this policy remains overly restrictive, raising concern over the ability to deliver windfall development and, therefore, the Parish Council's ability to meet their 100 units overall. Please refer to **paragraphs 3.18–3.21 of the appended Regulation 14 Representations**.

Policy DNP17 now states that development proposals affecting Protected Lanes will only be supported where it can be demonstrated that they will not "*give rise to a material increase in traffic using a Protected Lane such as to have a significantly adverse effect on the character of the lane.*" As detailed in the policy's supporting text there are 9 Protected Lanes within Danbury which feed into the local highway network and, therefore, any development within Danbury will inevitably result in the material increase in traffic using these lanes.

By comparison, CCC LP *Policy DM14 – Non-Designated Heritage Assets* is more flexible in its approach to Protected Lanes, by not limiting development which may impact upon such assets provided the level of harm can be minimised through the retention of features of significance and/or good design and/or mitigation measures. As outlined with the appended Regulation 14 Representation within the transport technical note, a series of measures are proposed including footway improvements along Mill Lane and the Avenue, encouraging local journeys to be made on foot. CCC's Protected Lane Assessments (2009 and 2017) which form part of the NP evidence base outline that options for influencing user behaviour through positive highway management which encourages journeys to be made on foot or by bicycle will reduce the impact of vehicles on the historic fabric of Protected Lanes.

As such it is still contended that *Policy DNP17* is not adequately justified and as currently worded would be contrary to the Framework's overarching aim and approach to growth demonstrated by its presumption in favour of sustainable development and, therefore, does not meet with Basic Conditions a and d of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The



Policy also impacts upon the Parish Council's ability to evidence a reliable source of smaller sites required by paragraph 72 of the Framework in light of windfall sites forming part of their anticipated supply. It is recommended that the wording of the policy be reviewed to reflect CCC *LP Policy DM14*, such that the lanes remain protected, however, still allow for an appropriate level of development to ensure flexibility across and beyond the Plan period and align with the Framework's positive stance to development.

Conclusion

Whilst Stonebond acknowledge the amendments which have been made to the NP since the Regulation 14 consultation, and whilst they support the aims of the policies in principle, it is considered that further modifications are required in order for Basic Conditions a, d and e to be met of Schedule 4B of the Town and Country Planning Act 1990 as explained fully within our client's appended Regulation 14 Representations (please refer to paragraphs 4.1-4.4 for a summary). The Plan is, therefore, at present not fit for purpose, nor flexible enough to react positively to changes over the Plan period, inhibiting its ability to contribute to the Framework's (2023) overarching ambition to ensure the achievement of sustainable development.

It is considered that further review of the Neighbourhood Plan's approach to the allocation of sites under Policy *DNP1* is required to ensure a robust Plan that will positively guide development across the Plan period. Hence, the NP should seek to identify additional sites in sustainable locations adjacent to the defined settlement boundary at sites such as "Land at Mill Lane" to ensure that the Plan is able to respond to delays in and the under delivery of allocated sites which may result as further technical work is undertaken. For the reasons outlined these sites should be of a size which exceeds the threshold requirements for the delivery of affordable housing, to ensure that the need for these dwellings is met. Review of policies *DNP1*, *DNP2* and *DNP17* should be completed for the reasons outlined in the appended Regulation 14 Representations.

We trust that these representations which include those documents appended (Regulation 14 Representations and Site Vision Document) submitted on behalf of Stonebond (Chelmsford) Ltd., will be useful and considered during examination of the Regulation 16 Neighbourhood Plan.

Should you wish to discuss the content of these representations and, or "*Land at Mill Lane*" promoted by our client, please do not hesitate to contact me.

Yours sincerely,

Nicky Parsons
Executive Director

Email:
Telephone: 01223 202100

Enc. Regulation 14 Danbury Neighbourhood Plan Representations including Site Vision Document.



REPRESENTATIONS TO THE REGULATION 14 CONSULTATION ON THE DANBURY NEIGHBOURHOOD PLAN

On behalf of Stonebond (Chelmsford) Ltd.

Date: March 2023 | Pegasus Ref: P22-2364



Document Management.

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Appendix 1 – Site Vision Document (submitted to Chelmsford City Council as part of the Call for Sites exercise)

Appendix 2 – Email Correspondence received from Essex Highways Strategic Development Manager



1. Introduction

- 1.1. These representations to the submission Danbury Neighbourhood Plan (Regulation 14) (hereafter referred to as 'the NP') are made by Pegasus Group on behalf of Stonebond (Chelmsford) Ltd. (hereafter referred to as 'Stonebond'). Stonebond has been in discussions with Danbury Parish Council in respect of "*Land at Mill Lane*" (hereafter referred to as 'the Site') and its potential for delivering residential development since 2020.
- 1.2. A Vision Document is attached at Appendix 1. This has been submitted to Chelmsford City Council as part of the Call for Sites exercise. It provides more information about the Site and the proposals.
- 1.3. The Site presented covers an area of approximately 3.2ha suitable for a residential development (including affordable homes) with a landscape and biodiversity led approach to include:
 - Residential development up to 30 dwellings (developable area of 2ha), of different tenures and sizes including bungalows, starter and family homes at a density which is appropriate for this edge-of-village location.
 - The natural bisection of the Site allows for an area for recreational or ecological/biodiversity uses for public benefit to the east.
 - Generous garden sizes and expansive landscaping and planting with Sustainable Drainage Systems.
 - Associated vehicular and pedestrian access including upgrades to the existing infrastructure and road network that has been agreed with Essex County Council (ECC).
- 1.4. The Site promoted by our client offers a sustainable and deliverable solution to housing growth within Danbury.
- 1.5. Stonebond appreciates this formal consultation on the submission version of the Danbury NP and the work undertaken by the Parish Council in its preparation. Nonetheless, Stonebond are not supportive of the NP in its current form. Our client does not support the method taken by the Parish Council to allocate sites or their approach to existing infrastructure, which in turn could prevent further growth beyond the suggested Plan period.
- 1.6. Our client is taking this welcomed opportunity to provide comment on the NP and the changes that are required to ensure a more robust document that covers the Plan period.



2. Legal Requirements and Planning Policy

Legal Requirements

- 2.1. These representations are framed in the context of the Basic Conditions relevant to the preparation of a Neighbourhood Plan as set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended), as follows:
- a) Having regard to national policies and advice contained in guidance issued by the Secretary of State;
 - b) Having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses;
 - c) Having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area;
 - d) Contributing to the achievement of sustainable development;
 - e) General conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);
 - f) Does not breach, and is otherwise compatible with retained EU obligations; and
 - g) Prescribed conditions are met in relation to the neighbourhood plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan.

National Planning Policy Framework

- 2.2. The National Planning Policy Framework (the Framework) sets out the Government's expectations of plan-making and decision-taking in a way that achieves sustainable development and delivers positive growth (see Ministerial forewords).
- 2.3. It emphasises the need to secure economic, social and environmental benefits, and at its core is the presumption in favour of sustainable development. It details the requirements for the preparation of neighbourhood plans to be in alignment with the strategic objectives of the wider area and the role which they play in the achievement of sustainable development.

Adopted Development Plan

- 2.4. In order to meet the aforementioned Basic Conditions and criteria set out within the Framework, neighbourhood plans should be prepared in alignment with the overarching strategic policies detailed within the Adopted Development Plan.
- 2.5. The Adopted Development Plan relevant to the preparation of the Danbury NP includes the following Chelmsford City Council (CCC) documents:



- Chelmsford Local Plan (adopted May 2020)

- 2.6. *Strategic Growth Site Policy (SGSP) 13 – Danbury* outlines an allocation for 100 new dwellings to adjoin the key service centre of Danbury. The site(s) accommodating this allocation are to be identified through the emerging Danbury NP. Overall principles of the site masterplan should include conserving and enhancing the Sites of Special Scientific Interest (SSSI) at Blakes Wood, Woodham Walter and Danbury Common, and provision of contributions towards mitigation measures identified in the Essex Recreational disturbance Avoidance and Mitigation Strategy (RAMS).
- 2.7. The around a 100 unit allocation outlined in SGSP 13 for Danbury was initially set during the 2013 Plan period.
- 2.8. Danbury is identified as a 'Key Service Settlement, located outside the Green Belt', with a good range of local services and facilities making it a prime location for sustainable growth. This advantageous location needs to be balanced with the not insignificant landscape, ecology, highway and heritage constraints of the settlement.

Emerging Development Plan

- 2.9. Chelmsford City Council (CCC) are currently conducting a review of the adopted Local Plan (adopted May 2020) with their Issues and Options Consultation running for 10 weeks from August until October 2022. The Council have now reviewed all comments received and feedback documents have been published (February 2023).
- 2.10. The Council's Issues and Options Consultation document, continues to identify Danbury as a Key Service Settlement (larger village) within the settlement hierarchy. The Plan outlines that development through medium to large village extensions would bring additional community facilities or improvements benefiting both existing and new communities.



3. Review of the Danbury Neighbourhood Plan

- 3.1. These representations are made to the current consultation (1st February – 15th March 2023) on the pre-submission version of the Danbury NP under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012.
- 3.2. This section highlights the key issues that Stonebond wishes to raise and seeks to provide recommendations for ensuring that the NP fully complies with the requirements of national policy.

Section 5: Housing and Development

- 3.3. Our client agrees with the overall objective outlined in respect of housing development *"to ensure there is high quality housing provision for all ages which responds to Danbury's needs. It should be appropriate to the scale and nature of the Parish, with distinct and separate identity of Danbury retained. Green energy in all development will be encouraged."* Nonetheless, it is considered that a series of amendments are necessary to ensure that the above objective/vision can be met, and the Plan be sufficiently flexible to positively guide development across the Plan period.

Policy DNP1: Housing Site Allocations – Housing Target

- 3.4. The DNP outlines that Danbury has been *"allocated around 100 new homes from the Chelmsford Local Plan 2020, to be accommodated within or adjoining the Defined Settlement Boundary."* Draft Policy DNP1: Housing Site Allocations goes on to identify 5 sites for allocation with the potential to deliver 93 dwellings. The balance up to the Local Plan (LP) housing requirement (circa 7 dwellings) is to come forward as windfall development on smaller sites to be determined against the policies in the NP.
- 3.5. Our client wishes to highlight their concern over the housing target identified. The 100 dwellings, as evidenced above is based upon the CCC 2020 LP and was first set during the 2013 Plan period. Whilst it is acknowledged that the use of this target aligns with the requirements of the Framework (paragraph 66), which outlines the need for Local Authorities to provide neighbourhood groups with a housing requirement to plan for over the NP period, it does not account for the age of the LP (including the age of the associated baseline information), nor the current review being undertaken. As such there is the risk that the current target may be found to be outdated.
- 3.6. In addition, the Danbury Housing Needs Assessment (March 2020) which forms part of the evidence base for the NP, does not provide an assessment of the headline figure (100 dwellings) owing to the target provided within the LP. It is contended that a more up to date housing needs assessment be conducted which again reviews tenure, affordability, type and size of housing but also the quantity required. This will improve the robustness of the Plan's evidence base and provide greater certainty in the needs of the community to be addressed throughout the Plan period.



- 3.7. It is anticipated that through the current work being conducted by CCC that a greater housing requirement will be identified and given Danbury's position within the settlement hierarchy and its inherent sustainability as a location to accommodate growth, this will be a location where further development may be directed. CCC's LP Issues and Options Consultation Document (August 2022), identifies for example, one growth option (Approach A) which provides an indicative number of 1500 homes to be provided across the five 'larger villages' which includes Danbury. If this figure were to be evenly distributed across the five settlements this would equate to 300 dwellings potentially being required within Danbury.
- 3.8. The Parish Council should, therefore, explore the opportunity to positively direct development in sustainable locations within the village through *Policy DNPI* and the NP more broadly. This would, ensure the vitality and viability of Danbury through the delivery of new market/affordable homes and opportunities for the expansion/enhancement of business and community facilities including upgrading and enhancements of existing infrastructure through the plan period and beyond. Thereby aligning with the Framework's overarching aim, the delivery of sustainable development, addressing the economic, social and environmental objectives outlined at paragraph 8. Failure to do so will result in the NP not meeting Basic Conditions a and d, and by not identifying a sufficient amount and variety of land to come forward, the NP will conflict with the Government's aspiration of significantly boosting the supply of homes (Framework – paragraph 60).
- 3.9. Our client's site at Mill Lane, which was previously promoted for allocation through the NP (reference D9) was identified as being suitable for the delivery of 30 dwellings within the Parish Council's Site Options and Assessment Report (November 2021 – produced by AECOM). The Site is located adjacent to the existing settlement edge to the south east of Danbury, bounded by residential development on three sides (northern, southern and western) and existing highway infrastructure to the north (Mill Lane) and east (Hyde Lane). It, therefore, forms a logical location for development which is consistent with the existing settlement pattern. The proposals have been informed by extensive technical work and discussions with ECC Highways with suitable access confirmed as achievable. Furthermore, the scheme proposed, accessed via Millfields to the west, would allow for the protection and enhancement of existing vegetated boundaries, thereby visually enclosing development from Mill Lane protecting its rural character.
- 3.10. Whilst the Parish Council's independent advisors deemed the Site to be suitable as indicated within the NP evidence base, the NP Steering Group have chosen to not include the Site as a draft allocation. It is considered that insufficient justification for the rejection of the Site has been provided within the Steering Group's Site Selection and Allocation Report (March 2022). The reasons cited relate to highways, specifically access and impact on local roads. However, as outlined within the NP evidence base (NP Highway Access Technical Note – August 2021) the Local Highway Authority considered that the Site would be suitable for the delivery of 30 dwellings through the mitigation package specified. A copy of email correspondence received from Essex Highways Strategic Development Manager confirming this, along with their recommendation to the Parish Council that they would not object to the inclusion of the Site within the NP, is provided at Appendix 2. Furthermore, the series of improvements



proposed as detailed in the Highways Technical Note appended to the accompanying Vision Document (Appendix 1) will make improvements to the highway and footway infrastructure for existing residents along Mill Lane, Hyde Lane and the Avenue.

Policy DNP1: Housing Site Allocations – Site Delivery/Achievability

- 3.11. The NP identifies site allocations under *Policy DNP1* that it considers will deliver 93 of the 100 homes required in the LP. The remaining 7 homes are to be delivered from windfall development. It is important and indeed necessary for the NP to ensure that the allocations are realistic in order for it to be considered to meet Basic Condition e. We have reviewed the allocations and note that Land at Tyndales Farm West is identified as delivering the largest proportion of development (circa 65 dwellings).
- 3.12. Figure 4 of the draft NP highlights those sites submitted and areas allocated for housing. In respect of Land at Tyndales Farm West, Figure 4 clearly shows a larger area as being submitted than has been allocated (labelled as Site B). In order to achieve the quantum of development required by the allocation, it would be necessary to provide a high density scheme in excess of 35 dwellings per hectare. This would raise significant doubts as to whether such a development would complement the character of the village and would conflict with NP's vision of ensuring that development "*is appropriate in scale and nature and integrated with the landscape and existing housing.*" Indeed, the 'Local Area' which the site adjoins (Runsell & The Lanes) as identified within the NP's accompanying Design Guide is characterised as being of a 'low density.'
- 3.13. It is understood that the land is being promoted by Richborough Estates and, therefore, a review of the information available on their website has been conducted in respect of the site. The website outlines that Richborough Estates have control of 80 acres on the eastern edge of Danbury and that their proposals are for two separate schemes of circa 30 units each which have been promoted through the NP. Therefore, there is the potential to provide 60 dwellings on land within their control. This number, however, applies to the larger area submitted through the NP process and as shaded in light purple on Figure 4. Hence, the smaller portion of land identified for allocation would not be capable of accommodating the 65 dwellings identified within *policy DNP1*. Furthermore, the masterplanning work available on Richborough Estates website shows the site comprising 30 dwellings, with areas of open space, landscaping and access off the A414 and Cherry Garden Lane.
- 3.14. This raises significant doubt about the deliverability of the largest allocation in the NP and, therefore, calls into question the ability of the NP to deliver sufficient housing in accordance with the requirements of the strategic policies of the Local Plan (Basic Condition e) and the NP's own aspirations.

Policy DNP1: Housing Site Allocations – Methodology/Approach

- 3.15. The Parish Council's Site Selection and Allocation document (March 2022) which informs *Policy DNP1* details the approach which has been adopted, and the evidence which underpins the allocation of sites. Our client contends that the approach is not adequately evidenced or



justified and, therefore, is not robust. The above referenced document outlines the sites which were considered 'suitable or potentially suitable' based upon, the Parish Council's independent consultant's (AECOM) Site Assessment and Options Report 2021. It, however, fails to mention that the conclusions of the AECOM Assessment assume a maximum of 30 dwellings per site. As the AECOM Assessment explains, the use of this upper limit was requested by the NP Steering Group following AECOM's initial 2019 Assessment and the results of the Danbury NP questionnaire which highlighted residents' preference for the allocation of smaller sites. Inclusion of 65 dwellings at Tyndales Farm West is, therefore, not supported by the site assessment work completed.

- 3.16. In addition, AECOM's previous site assessments (2019 and 2020) concluded that Land at Tyndale Farm was unsuitable for development providing a 'red' rating owing to a significant number of constraints including landscape impact. This rating was changed to 'amber' within the latest Assessment (2021) and the site identified as having the potential for development (up to 30 dwellings). AECOM's Assessment claims that this shift results from additional landscape evidence which improves the Site's landscape capacity for development from 'low-medium' to 'medium'. The relevant updated landscape information has, however, not been included within the NP evidence base and, therefore, does not provide for further scrutiny of the findings and the conclusions which have subsequently been drawn¹. As such, currently there is no supporting published evidence for the claim that landscape sensitivity is less than previously assessed, and that allocation of Land at Tyndales Farm West is suitable over other sites.
- 3.17. Furthermore, as detailed in AECOM's assessment an outline planning application was submitted for 100 dwellings to CCC in 2017 (LPA Ref: 17/00089/OUT) and refused with 8 reasons listed. The Officer's report outlined the proposals as forming an *"urban and intrusive encroachment into the open and rural landscape"* resulting in the loss of Danbury's *"undulating and open arable"* setting. The proposal was, therefore, considered to be "harmful to the intrinsic character and beauty of the countryside contrary to Policies CP5 and DC2." This was echoed in the Parish Council's consultee response to the application which stated, that *"the proposal for the site would be high density, completely out of keeping with the surrounding housing and would cause damage to the visual impact of the area, particularly since it is on the rural boundary of the village."* Indeed, further evidence is required to support development of the scale (65 dwellings) proposed within the NP at this site, as a result of the potential landscape impact. In the absence of this, allocation of the site would conflict with the LP, failing Basic Condition e.

¹ The document referenced is the "Technical Note: Addendum to the Landscape Sensitivity and Capacity Assessment for Revised Land Parcels at Danbury East (September, 2020)" which whilst included in the NP evidence base is missing several pages and, therefore, only provides an assessment for site D4 and not D5, D7 or D9.



Policy DNP21: Rural and Protected Lanes – Site Deliverability

- 3.18. In addition, our client wishes to raise their concern over the restrictive nature of *Policy DNP21: Rural and Protected Lanes* in the delivery of windfall development and, therefore, the Parish Council's ability to meet their 100 units overall. *Policy DNP21* outlines that development proposals affecting protected and non-designated local lanes will not be supported if they "will give rise to intensification of traffic using a Protected Lane." There are 9 Protected Lanes identified within Danbury which as shown on Figure 9 of the NP feed into and form part of the local highway network and, therefore, any development within Danbury will inevitably result in the intensification of traffic using Protected Lanes. *Policy DNP21* in its current form would preclude development coming forward in otherwise sustainable locations adjacent to Danbury's urban area, arbitrarily restricting growth opportunities and limiting scope for addressing the requirements of the future and beyond the Plan period.
- 3.19. By comparison, CCC LP *Policy DM14 – Non-Designated Heritage Assets* is more flexible in its approach to Protected Lanes, by not limiting development which may impact upon such assets provided the level of harm can be minimised through the retention of features of significance and/or good design and/or mitigation measures. As outlined within the appended transport technical note a series of measures are proposed including footway improvements along Mill Lane and the Avenue, encouraging local journeys to be made on foot. CCC's Protected Lane Assessments (2009 and 2017) which form part of the NP evidence base outline that options for influencing user behaviour through positive highway management which encourages journeys to be made on foot or by bicycle will reduce the impact of vehicles on the historic fabric of Protected Lanes.
- 3.20. As such, it is contended that *Policy DNP21* is not adequately justified and as currently worded would be contrary to the Framework's overarching aim and approach to growth demonstrated by its presumption in favour of sustainable development and, therefore, does not meet with Basic Conditions a and d of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The Policy also impacts upon the Parish Council's ability to evidence a reliable source of smaller sites required by paragraph 71 of the Framework in light of windfall sites forming part of their anticipated supply. It is recommended that the wording of the policy be reviewed such that the lanes remain protected, however, still allow for an appropriate level of development to ensure flexibility across and beyond the Plan period and align with the Framework's positive stance to development.
- 3.21. It should also be noted, that the accompanying transport technical note (Appendix 1), relating to Mill Lane, evidences that the traffic generated from 30 dwellings would not result in a material impact on the operation of links reviewed as part of the assessment. Notwithstanding this, highway improvements would be proposed to reduce any residual impact, balanced with discouraging more traffic from using these routes (from within Danbury) as discussed with ECC Highways Officers. This includes mitigation which maintains the surrounding rural lane environment whilst improving existing routes for road users. The mitigation package as discussed with ECC Highways Officers, would include the following (further detail provided at Appendix 1):



- Footway enhancements along Mill Lane and the Avenue including provision of uncontrolled pedestrian crossings (new dropped kerbs and tactile paving) and footway resurfacing as identified in the accompanying technical note (Appendix 1).
- Possible contribution to CCC towards maintenance of vegetation to increase available footway widths.
- Carriageway widening/creation of passing places along Mill Lane and Hyde Lane as identified in the accompanying technical note (Appendix 1).
- Traffic management measures to discourage vehicular traffic using Mill Lane north-west (Protected Lane) and Hyde Lane/Mill Lane south.

Policy DNP2: Housing type, mix and tenure - Affordable Housing

- 3.22. *Policy DNP2: Housing type, mix and tenure* of the draft NP outlines the proposed requirements in respect of affordable housing which applies to development of ten or more homes. The policy details that 35% of homes should comprise affordable housing, being split such that 64% are offered as social or affordable rent, with 36% comprising affordable routes to home ownership, including housing at less than market value for first time buyers/young people. This is reflective of the current adopted *Policy DM2* of the CCC Local Plan.
- 3.23. Based on the above the indicative housing target of 100 dwellings proposed for the village would result in the delivery of 35 affordable dwellings. However, in line with the number of dwellings allocated for each site, at present this would result in approximately 31 affordable dwellings for Danbury based upon the 93 dwellings identified and the affordability threshold of 10 dwellings and above (majority of the allocated sites fall below threshold to trigger affordable housing). This figure incorporates the proposed delivery of the 10 almshouses at Sandpit Field (Site A) which are identified within the NP to be 100% affordable. We suggest, however, that this figure will significantly reduce when the realistic quantum of housing at *Land at Tyndales Farm West* is accounted for. We believe this could reduce the potential quantum of affordable housing to just 20 homes for Danbury. As the remaining development required to meet the Plan's identified target is to be delivered through smaller sites (windfall) these will fall below the affordability threshold and, therefore, will not contribute further affordable units. Furthermore, inclusion of Site A within the above calculation is based on the assumption that the almshouses to be provided meet with the definition and requirements of affordable housing as detailed at Annex 2 of the Framework. Failure to align with these, would remove the 10 dwellings from the affordable housing supply to be secured through the NP.
- 3.24. The Danbury Housing Needs Survey (2020) highlights that 51 households are projected to require affordable housing to rent over the Plan period and 95 households are projected to require affordable housing for sale. Therefore, at present the proposed strategy for affordable housing delivery will not meet the identified needs of the village and wider area. This must be considered in the context of a Local Authority which as of February 2022 declared a housing crisis. In declaring this crisis, CCC welcomed a Housing Strategy in March 2022 that seeks to



increase the supply of affordable homes to strengthen the Council's strategic response to meeting local need. Moreover, the current undersupply of affordable housing is recognised as a key issue within the Danbury Parish Area as detailed in the NP and as evidenced within the Danbury Housing Needs Assessment (2020).

- 3.25. Having regard to the above and our position that there is a need to identify further sites for allocation, it will be important to ensure that these sites are of a sufficient size to meet the threshold for providing affordable housing. The NP should take direct and positive action to address this key issue identified by the Parish Council and Local Planning Authority. One way to address this would be to allocate further qualifying sites such as that proposed by Stonebond. Land at Mill Lane, would assist the Parish with meeting this identified need ensuring the delivery of much needed on-site affordable housing tailored to the needs of the community in line with draft *Policy DNP2*.



4. Summary and Conclusion

- 4.1. Whilst Stonebond support many of the aims of the policies in principle, it is considered that modifications to the NP are required in order for Basic Conditions a, d and e to be met. The Plan is, therefore, at present not fit for purpose, nor flexible enough to react positively to changes that may occur over and beyond the Plan period inhibiting its ability to contribute to the achievement of sustainable development.
- 4.2. It is contended that an uplift in the housing target for Danbury is required given that the current figure was established during the 2013 Plan period, the age of the adopted LP (2020) and its current review. It is anticipated that additional development will need to be directed towards Danbury through the LP review given its position in the settlement hierarchy and, the village's inherent sustainability. The NP provides the Parish Council with the opportunity to positively direct growth in sustainable locations within and/or adjacent to the existing settlement boundary. The Parish Council should, therefore, consider the allocation of further sites which have already been assessed as suitable through the NP making process such as *Land at Mill Lane* (Vision Document at Appendix 1). These sites should be of a size that will meet the threshold for the provision of affordable housing given the identified need which will continue to be unmet with the draft allocations.
- 4.3. In addition, the proposed housing strategy at draft *Policy DNP1* requires further review. The residential yields of those sites identified as draft allocations need to be re-assessed to ensure that they are achievable and align with NP's own design guidance, particularly with reference to *Site B – Land at Tyndales Farm West*. Failure to do so could result in an inability to meet Danbury's housing target, conflicting with the requirements of CCC's LP (Basic Condition e), and the need for speculative development in the future to address the housing needs of the village. In terms of windfall development upon which the housing strategy also relies, the wording of *Policy DNP21* relating to Protected Lanes in its current form will preclude these smaller sites from coming forwards. As such the restrictive wording of this Policy requires addressing such that the proposed housing strategy can be delivered and development in sustainable locations supported in line with Basic Condition d.
- 4.4. Whilst in general conformity with the objectives of national policy the NP arguably at present does not meet with the Framework's overarching aim to ensure sustainable development (Basic Conditions a and d). As such, it is considered that the NP does not meet all the Basic Conditions of Schedule 4B of the Town and Country Planning Act 1990 as explained throughout these Representations. It is, therefore, recommended that the Parish Council review further the housing needs of Danbury and provide a strategy with greater flexibility and scope for development to come forward in the Plan period. This will enable the Plan to meet local community needs, addressing the social, economic and environmental elements of sustainable development detailed at paragraph 8 of the Framework. It is considered that the allocation of *Land at Mill Lane*, would assist the Parish Council in meeting their overall objective in respect of housing and those aspirations of the LP more broadly.



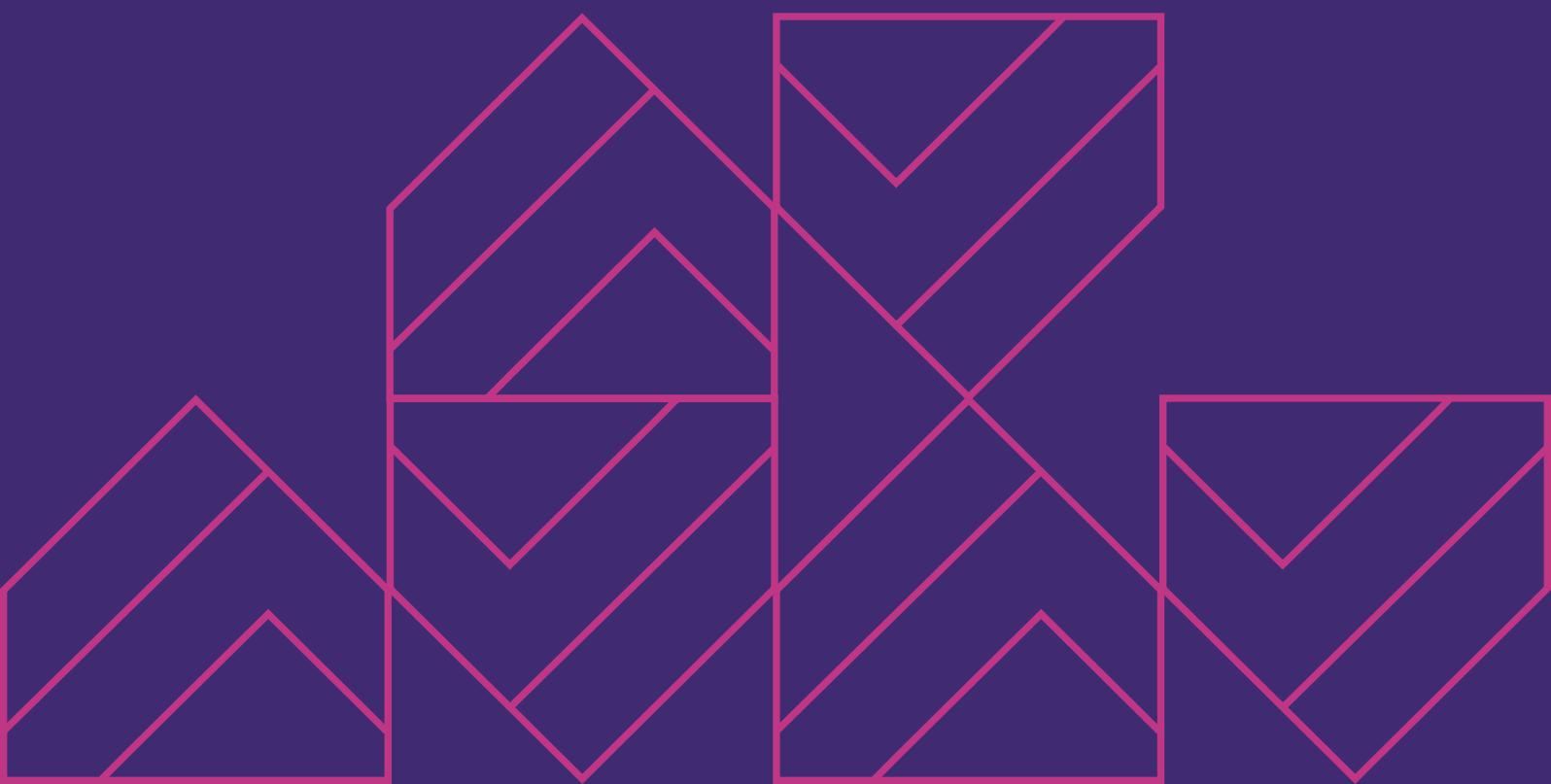
Appendix 1

Site Vision Document (submitted to Chelmsford City Council as part of the Call for Sites exercise)

Land at Mill Lane, Danbury, Chelmsford.

Vision Document





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Appendices.

Appendix 1: Highways Technical Notes and Proposed
Highway Improvements

Appendix 2: Proposed Access Detail

Appendix 3: Illustrative Masterplan



Introduction.

This Site Promotion Document has been prepared by Pegasus Group on behalf of Stonebond (Chelmsford) Ltd., the promoter of Land at Mill Lane, Danbury (the Site) for residential development of approximately 30 dwellings with a significant portion of public open space/landscaping proposed.

The Land at Mill Lane, Danbury can sustainably assist Chelmsford City Council in boosting the supply of housing over the new Plan period, in addition to providing other social, environmental and environmental benefits as set out within this Document.

Stonebond is a family-owned development business established in 1975, based on New London Road, Chelmsford.

Stonebond aim to create quality new homes that complement their surroundings and create a special sense of place. To achieve this, they engage carefully with local stakeholders and take ownership of the design and construction of their developments from inception to delivery, employing expert local tradespeople and utilising sustainably sourced materials.

Everyone deserves to live in a home they love. And at Stonebond that's our mantra.





In recent years they have delivered new homes in partnership with Chelmsford City Council in Writtle, Stock and Springfield Road, along with numerous other schemes in nearby Brentwood, Epping and Uttlesford. They specialise in the delivery of new market and affordable homes in semi rural locations and have in depth knowledge of the character and quality of finish which is required within this environment.

This document provides details of the current planning policy context within Chelmsford and specifically Danbury as well as details about Land at Mill Lane, its development potential, and its sustainability credentials. It explains why the Site should be allocated to deliver residential development.





Planning Policy Context.

Local Plan

The Chelmsford Local Plan (2013–2036) was adopted by Chelmsford City Council in May 2020. The Plan shapes future growth and development throughout the city and outlines the strategic development needs throughout the plan period.

Strategic Growth Site Policy 13 – Danbury outlines an allocation of 100 new dwellings adjoining the key service centre of Danbury. The site(s) accommodating this allocation are to be identified through the emerging Danbury Neighbourhood Plan. Overall principles of the site masterplan should include conserving and enhancing the SSSIs at Blakes Wood, Woodham Walter and Danbury Common, and provision of contributions towards mitigation measures identified in the Essex Recreational disturbance Avoidance and Mitigation Strategy (RAMS).

The 100 unit allocation outlined in SGSP 13 for Danbury was initially set during the 2013 Plan period. The figure is now considered to represent the baseline of what is expected to be developed in the village across the Plan period to 2035/36. The proposed site offers the opportunity to contribute towards the identified need of Danbury earlier in the Plan period than the adopted Local Plan had previously outlined, owing to the available and deliverable nature of the site.

Danbury is identified as a 'Key Service Settlement, located outside the Green Belt', with a good range of local services and facilities making it a prime location for sustainable growth. This advantageous location needs to be balanced with the not insignificant landscape, ecology, highway and heritage constraints of the settlement.

As of 2022, Chelmsford City Council are conducting a review of the Local Plan to ensure that the numbers of dwellings and locations of new development remains in line with the needs of the Local Authority area. The review also seeks to identify areas for protection, including open space and wildlife zones.

Neighbourhood Plan

The Danbury Neighbourhood Plan is currently at an advanced stage of preparation. Stonebond (Chelmsford) Ltd., are strongly committed to working constructively with the Parish Council and local community to enable the delivery of a high-quality, self-contained scheme which fully meets the needs of the parish.

The National Planning Policy Framework (NPPF) states that Neighbourhood Planning is designed to give communities the direct power to develop a vision for their neighbourhood and deliver the sustainable development they need.

The Neighbourhood Plan is being prepared by the Steering Group which is comprised of local residents, business, and stakeholders with a specific interest in Danbury. Stonebond have been engaged in the Neighbourhood Plan making process having submitted 'Land at Mill Lane' during their initial Call for Sites consultation exercise. Ultimately, the Parish Council felt that whilst there are no technical, landscape, heritage or flood risk issues with the site (as demonstrated in Table 2), the proposed scheme could not be carried forward in the initial allocations for the following reasons:

- **Access** – *Essex Highways Advice (2021) states that an access from Millfields could be created to encourage vehicular traffic to turn left out of the site with a mitigation package. No effective methodology to implement this package has been identified.*
- **Local Roads** – *D Development of this site will significantly impact the rural nature and limited width of the network of local roads, leading to intensification of Mill Lane, The Avenue and Hyde Lane.*



It is contended that the above reasons for dismissing the Site are inadequately justified and can be easily addressed, as demonstrated within this Document. The reasons outlined relate directly to access and highways impact and do not reflect the outcome of discussions held between Stonebond (Chelmsford) Ltd alongside their appointed highways consultant with Essex County Council Highways and Chelmsford City Council in July 2021. Following the submission of two technical highway notes (found at appendix 1) to Essex County Council it was confirmed by the Highway Authority that with provision of an access

to the Site off Millfields and the implementation of a package of mitigation measures then there would be no objection to the proposal on highways grounds.

As such, it is considered that the City Council should lead in this matter and proceed to allocate the Site for development in recognition of the ability of the Site to contribute to the growth needs of this settlement as well as assisting the Council in meeting its housing needs and protecting more sensitive locations within the Green Belt.



- 1. Bus Stop
- 2. New Development
- 3. Danbury Parish Church
- 4. Country Park
- 5. Danbury Sign
- 6. Danbury Village Hall



Local Context.

Danbury is a large village approximately 6 km east of Chelmsford. The village has a population of approximately 6,500 (2011 Census) and is identified as a Key Service Settlement in the adopted Chelmsford City Council Local Plan (2020).

Danbury has a wide range of services including two primary schools, a GP practice, village hall, children's play areas, social and sports facilities, and an array of convenience stores and restaurants. A selection of the amenities available are summarised below:



Table 1:
Distances and journey times to local facilities and services. Measured from the approximate site access location.

Figure 1:
Site Location Plan

Facility/Service	Distance	Approx. Cycle Time	Approx. Walk Time
Schools			
St John's C of E Primary	1.5km	7-10 minutes	15-20 minutes
Danbury Park Community Primary	2.5km	10-15 minutes	30-35 minutes
Priory Primary School	2.8km	7-10 minutes	30-35 minutes
The Sandon School, Great Baddow	6.2km	20-25 minutes	n/a
Plume Academy	7.6km	20-25 minutes	n/a
Food Stores			
Tesco Express	850m	3-5 minutes	10-15 minutes
Londis	1.1km	5-10 minutes	15-20 minutes
The Co-operative Food	1.5km	5-10 minutes	20-25 minutes
Morrisons Superstore	5.3km	15-20 minutes	n/a
High Street Amenities			
Post Office	1.4km	5-10 minutes	20-25 minutes

Continued opposite.



Sports & Recreation			
Danbury Sports & Social Centre	1.4km	5-10 minutes	15-20 minutes
Danbury Tennis Club	1.4km	5-10 minutes	15-20 minutes
Danbury Commons National Trust	1.5km	5-10 minutes	15-20 minutes
Xtreme Gym	2.7km	10-15 minutes	30-35 minutes
Danbury Country Park	2.8km	10-15 minutes	30-35 minutes
Pubs, Restaurants, Cafes			
Danbury Fish & Chips	700m	3-5 minutes	10-15 minutes
The Anchor	1.0km	3-5 minutes	10-15 minutes
The Bakers Arms	1.0km	3-5 minutes	10-15 minutes
Tea on the Green	1.2km	5-10 minutes	15-20 minutes
Zara Indian Cuisine	1.7km	5-10 minutes	15-20 minutes
Medical			
Danbury Medical Centre	1.0km	5-10 minutes	10-15 minutes
Danbury Dental Care	1.0km	5-10 minutes	10-15 minutes
Boots Pharmacy	1.3km	5-10 minutes	15-20 minutes
Other			
Esso Petrol Station	700m	3-5 minutes	5-10 minutes
Danbury Evangelical Church	850m	3-5 minutes	5-10 minutes
Eves Beauty Salon	1.1km	5-10 minutes	10-15 minutes
Danbury Village Hall	1.2km	5-10 minutes	15-20 minutes
Bumblebee Day Care	1.4km	5-10 minutes	15-20 minutes

Transport connections

The nearest bus stops are located on the A414 approximately 500m to the north west of the Site. The stops are located close to the junction with The Avenue and are served by route 31 which provides services to Chelmsford City Centre and Maldon and Burnham every 30 minutes. The service is consistent through the day starting at 6am and operating until 23:35pm. Service 331 also serves these stops hourly along a similar route to the 31. There is a continuous footway connection between the edge of the site and the A414 (via Mill Lane and The Avenue) which provides access to the existing public transport interchanges.

In terms of Railway Stations, the closest is located at South Woodham Ferrers (Wickford and Southminster) approximately 8.6km to the south of the Site providing regular services to Wickford and Southminster. Hatfield Peverel Train Station is approximately 10km to the north of the Site providing services to London Liverpool Street and Ipswich whilst also connecting with Chelmsford Station which is found approximately 10.4km to the west of the Site (services to London Liverpool Street, Norwich, Colchester, Ipswich).

Danbury lies on the A414, a primary and important local distributor road providing a strategic connection to the A12 and Chelmsford to the west and Maldon to the east.



Site Characteristics and Technical Considerations.

Site Characteristics at a Glance

Table 2:
Site Characteristics and Designations

Site Characteristic	Designation and Physical Features
Existing use	Arable farmland.
Neighbouring land uses	Residential properties (use class C3) to the north and west. A residential property set within extensive grounds (use class C3) to the south. To the east lies fields currently used for grazing.
Public rights of way (PRoW)	There are no PRoW which traverse or adjoin the Site.
On-site planning designations	None.
Flood Zone	Flood Zone 1 (i.e. lowest risk of flooding and sequentially preferable location for residential development).
Landscape	No formal landscape designations. The site benefits from strong visual enclosure by virtue of the existing mature vegetation on the boundaries.
Trees	No Tree Preservation Orders (TPOs) within the boundary of the site.
Contamination	Given the existing use of the site the risk of contamination is considered low, subject to surveys.
Heritage Assets	There are no listed buildings or Scheduled Monuments within immediate proximity of the site, with the closest Grade II listed Blue House Farmhouse approximately 230m south of the Site.
Ecological designations	The Site is not subject to any statutory or local ecological designations. The site is located within the impact risk zone of the Danbury Common Site of Special Scientific Interest (SSSI) which is located at its closest point approximately 450m to the west of the Site beyond existing residential development.





Opportunities and Constraints

The Site has relatively few physical or environmental constraints. Owing to its arable use, the site is largely lacking in natural features. The Site does, however, benefit from strong natural boundaries which can be enhanced through the development.

Stonebond have carefully considered the site's opportunities and constraints which have been carried through the design process and informed the Illustrative Masterplan (Figure 2) contained in Section 5 below.

Key opportunities include:

- Well contained site providing a natural limit to the proposed development.
- Location is a logical extension to the existing village and is in proximity to the village's many shops and services.
- A natural bisection of the site which allows for an over provision of recreational or ecological uses for public benefit to the east.
- Retention and enhancement of existing natural boundaries of the site.
- Available and deliverable site which benefits from connections to existing utilities in the village and has relatively few technical constraints.
- The size of the site allows for a mixed development including bungalows, M4(3) housing, starter and family homes at a density which is appropriate for this edge-of-village location.
- The proposed density of the site allows for generous garden sizes and expansive landscaping and planting.
- Landscape and biodiversity led approach.

Key Constraints which have assisted in the proposed masterplan:

- The need to respect existing dwellings in proximity to the site through suitable planting and layout design.
- Existing sewer easements across the western boundary of the site must remain free of development.
- Glimpsed views into the site from surrounding countryside can be mitigated by strategic landscaping and vegetation enhancements to soften the visual impact of development.





Key Technical Considerations

Highways

As referenced in Section 5 below, it has been demonstrated through initial technical work, that vehicular access is achievable to the west of the Site off Millfields. A copy of the proposed Access prepared is provided at Appendix 2. It has also been shown how a pedestrian connection can be achieved to the north onto Mill Lane and as set out within **Table 1**, this provides the opportunity to walk/cycle to local services and facilities. As the proposals are for up to approximately 30 dwellings, it is unlikely that the development would give rise to an unacceptable highway impact as outlined in the Transport Notes prepared and found Appendix 1. Nonetheless, additional technical work would be completed to assess transport impact at application stage or later in the promotion.

Flooding

As referenced in **Table 2** above in respect of flooding from rivers, the Site lies within Flood Zone 1 in its entirety, according to Environment Agency mapping. The Site is identified as predominantly being at 'very low risk' (less than 0.1% risk each year) from surface water flooding with small pockets at 'low risk' (between 0.1 and 1% risk each year). Nonetheless, proposals will be subject to a comprehensive Flood Risk Assessment and a Drainage Strategy prepared to ensure that there would be no adverse impacts arising in the surrounding area, with run off rates replicating current green field rates.





Amenity

It is considered that there would be no impact upon the amenity of the neighbouring residential dwellings given the size of the Site and the ability to pull development back from the edge of the Site boundary. Nonetheless, amenity would be further reviewed and form a key consideration in the preparation of final development proposals.

- 1. Millfields Corner looking towards the site
- 2. Site Boundary with built form





The Proposal.

Land at Mill Lane, Danbury, has a site area totalling approximately 3.4ha in single landownership. Initial proposals have evolved with consideration of the opportunities and constraints affecting the site detailed in the previous section as well as productive consultations with local stakeholders. An Illustrative Layout has been prepared at (Figure 2: Illustrative Masterplan) below which shows the Site capable of delivering the following:

- Development of the western enclosed field covering an area of approximately 2 ha for 30 dwellings at a density of approximately 15 dwellings per hectare. A low density which respects the existing setting and character of housing in this location. Green spaces, generous gardens and a low density semi-rural street scape.
- The eastern field measuring approximately 1.3 ha to be retained as open space including biodiversity enhancements, recreation and walking routes.
- Existing natural boundaries along all four edges of the proposed developable area are to be retained and enhanced with native species. Greater structural planting along the western boundary would be incorporated to act as a green buffer between the existing properties accessed off Millfields.
- Surface water attenuation basins functioning also as semi-wet wildlife features and surrounded by landscaped open space.
- Site vehicular access to be formed off Millfields and a new formalised off road pedestrian link from Mill Lane to Hyde Lane. Both of which have been subject to consultation with Essex County Council and further details of which are provided at Appendix 2.





Scheme Benefits.

The proposed development of Land at Mill Lane, Danbury would deliver an array of benefits for the community as outlined below:

Economic Benefits

- The development will directly create jobs and employment opportunities during the construction phase.
- New residents will increase spending in the local area, helping to support jobs and businesses within the local community and ensuring the vitality of the village.
- S106/CIL payments derived through the planning process can be used for improvements to local infrastructure or service provision. Once the Neighbourhood Plan is adopted, 25% of CIL monies raised from the development will be automatically allocated to the Parish Council.

Social Benefits

- A substantial portion of the site is to be given over to public open space creating the opportunity for additional recreational facilities and biodiversity enhancement in excess of what is required under local policy.
- The proposed scheme provides an opportunity to deliver additional new homes in the short-term to address current housing needs in an area which is significantly constrained by affordability pressures.
- The proposed development will provide affordable housing in line with the Council's policies and with due consideration to Chelmsford City Council's declared Housing Crisis. Stonebond (Chelmsford) Ltd are in a position to deliver affordable housing rapidly and on an appropriate scale to reflect the needs of the community.
- Enhanced off-road pedestrian routes will be provided within the vegetation buffer to enhance usability and safety of the existing footpaths.
- Delivery of bungalows to meet an identified local need in the village for those looking to downsize and elderly residents.
- Stonebond are in a position to rapidly develop this parcel of land and are committed to doing so in 24–30 months following commencement. A minimised development timeframe will cause less disturbance to nearby residents and delivers much needed housing rapidly.

Environmental Benefits

- The location off Mill Lane and Millfields is well linked to a wide range of shops, services and facilities which reduces the need to use personal car transport for day-to-day needs. The proximity of bus stops and several bus routes through the village provides residents with viable alternatives to private car transport and links the development to Chelmsford.
- The development will enhance biodiversity in the area by devoting a large portion of the land available to open space and biodiversity enhancements. In addition, hedgerows on site are to be retained and enhanced to protect these vital habitats.
- Sustainable urban drainage techniques will be adopted on-site to minimise surface water run-off, improve water quality and protect the local environment.





Deliverability and Availability.

The Site is being actively promoted by Stonebond and is available for immediate delivery. Should the Site be allocated for development through the review of the Chelmsford City Council Local Plan, it is envisaged that the planning application process could be concluded in 6-12 months, with other technical approvals thereafter. Accordingly, the Site would be available for development within the first 5 years of the Plan period.

There are no known insurmountable constraints with the Site which render it undeliverable.

1. The Bell
2. Danbury Primary School
3. Danbury High Street





Conclusions.

This Site Promoter Document should be read in conjunction with Stonebond (Chelmsford) Ltd.'s submission to the Chelmsford City Council Call for Sites, which will be assessed through the Strategic Housing and Economic Land Availability Assessment (SHELAA).

It is evident that Danbury is a sustainable location for growth with good access to a range of services and accordingly holds status within Tier 2 of the Settlement Hierarchy of the adopted Local Plan (Chelmsford City Council, 2020) for directing growth in sustainable locations.

The Site at Mill Lane, is relatively unconstrained, well positioned in respect of access to the village's existing facilities, and physically well contained forming a logical extension to the settlement. A desk-based review of site technical matters indicates there are no clear constraints to development that could not be fully addressed through careful scheme design with Stonebond (Chelmsford) Ltd committed to ensuring that no adverse impacts would result from the proposed development.

With the Site currently being in arable use there are substantial opportunities for biodiversity improvements which can be delivered through the illustrative proposals outlined in this document which included 1.3 ha of land to be given as public open space/ecological enhancement. Furthermore, Stonebond (Chelmsford) Ltd are committed to providing a scheme which meets with the identified needs and aspirations of the local community in terms of proposed housing mix, density and design which they propose to assimilate into the Site's semi-rural edge-of-village location.

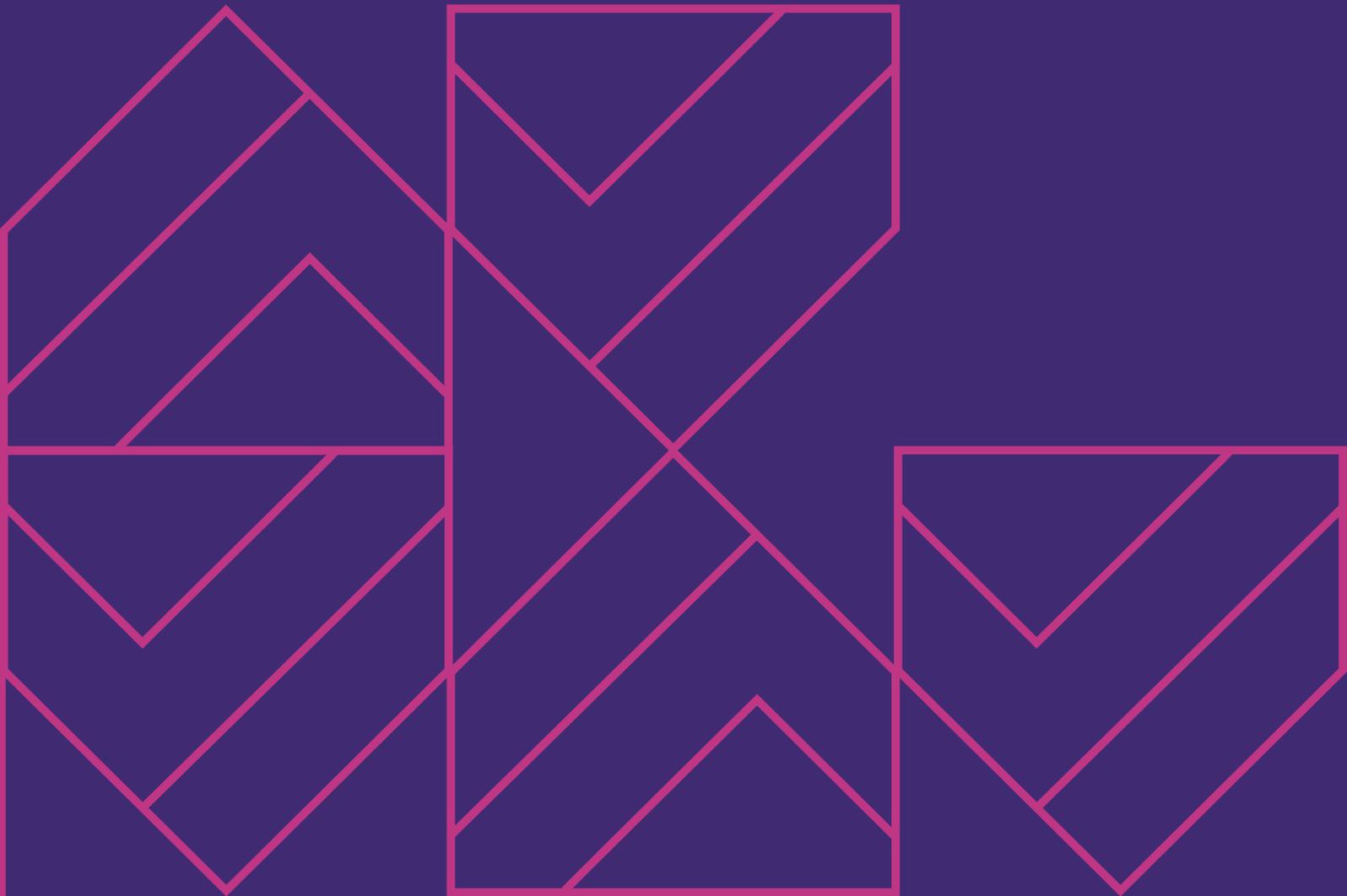
Allocation of the small/medium sized site would form part of a balanced and varied growth strategy which would contribute to the Council's housing delivery in the early part of the Plan period, when compared with larger/strategic development sites. As such, it is strongly recommended that Land at Mill Lane, Danbury be allocated for development.





Appendices.







Appendix 1.

Highways Technical Notes and Proposed Highway Improvements



**ZA931 – Land to the South of Mill Lane, Danbury
Technical Note 2 – Local Highway Network Review
For Stonebond Properties (Chelmsford) Ltd
June 2021**

Executive Summary

Stonebond Properties (Chelmsford) Ltd (Stonebond), are promoting development of land south of Mill Lane for up to 30 residential dwellings. The site is currently being considered for allocation as part of the Danbury Neighbourhood Plan (DNP) (site reference D9).

The DNP working group has consulted with Essex County Council (ECC) highways on the potential sites. ECC reviewed the Mill Lane site and formally responded stating that they did not consider the wider local highway network (Mill Lane, The Avenue and Hyde Lane) was suitable to accommodate the additional trips associated with the development.

CCE prepared Technical Note 1 to seek to address these concerns. CCE and Stonebond met with ECC (in April 2021) to discuss the note, where ECC explained they had the following concerns:

- Footway Link – they consider the existing footway links are too narrow and would discourage walking leading to more car trips.
- Highway Links – they consider that Mill Lane, The Avenue and Hyde Lane are too narrow and have limited passing opportunities to support an additional 30 dwellings. However they may support a development of between 6 and 10 dwellings.

Subsequently CCE have assessed the existing footway provision and the existing carriageway provision along the lanes, which are presented in this Technical Note (number 2). In addition an updated vehicle impact assessment has been carried out to seek to address ECC concerns and to demonstrate that the potential site will not result in a severe impact on the local network in terms of capacity of safety.

A summary of the assessment is provided below:

Footway Link Assessment

A site visit was carried out on the 26th May 2021 to review the pedestrian facilities on Mill Lane and The Avenue. The review considered the existing footway widths, pedestrian crossing provision, condition of the surfacing and any obstructions on the link. This information has been used to prepare a set of plans of the link where the existing provision has been assessed against national guidance. Based on this information it has been estimated

- that 100% of The Avenue is at least 2.0m wide (with short narrowing sections around the existing trees), which is in accordance with the recommended minimum width for new footways;

- that 51.5% of the Mill Lane footway is at least 1.5m which can accommodate pedestrians passing a wheelchair or push chair;
- that a further 45.4% of the Mill Lane footway is between 1.2 and 1.49m wide which can accommodate vulnerable road users and two pedestrians passing; and
- that there is a short section (17m) where the footway narrows to 1.0m.

Having reviewed the existing conditions the following improvements are proposed:

- To provide new uncontrolled crossing at Millfields, Pedlars Path, Mill Lane (east of The Avenue) and The Avenue (at the junction with the A414);
- To resurface two sections of footway (to the west of Millfields and to the east of Pedlars Path); and
- To pay a contribution towards the maintenance of the existing vegetation.

The effects of these proposals have been reviewed using TfLs Healthy Streets Check toolkit which shows a benefit to pedestrian accessibility of up to 18%. Therefore it is considered the proposals provide a significant benefit for all users and would be attractive to new residents.

Highway Link Assessment

A site visit was carried out on the 26th May 2021 to review the existing highway network (including spot widths, location of passing opportunities, condition of surfacing and on street parking).

New traffic surveys were carried out to record vehicle speeds and traffic volumes, which have been compared to historic 2017 data. The 2017 traffic data (the higher data) has been used as the base to assess the vehicular impact of the potential development on the surrounding network, which shows that:

- there are a number of passing opportunities on the links which are spaced along the link with short single lane sections between;
- existing vehicle speeds are lower than 30mph on all links, and based on vehicle speeds there is generally good visibility between passing place;
- there are no existing road safety issues;
- it is estimated that a single lane road has a two-way capacity of between 100 and 300 vehicles, which is significantly influenced by the proportion of traffic in each direction. With the exception of Mill Lane (west) the two way trips are less than 100 vehicles on all links. On Mill Lane the two way trips are 101 without the development and 108 with the development. However the movements on this link are tidal with 82% of trips travelling westbound in the AM peak. Therefore it is consider the capacity would be at the higher end of the scale;

- the link flows are less than 400 two way trips on all links and therefore the development would not adversely affect delay;
- that the probability of vehicle encounters, from opposing directions, would increase by a maximum of 1.02% (on the single lane sections of the highway network), which equates to an increase of 1 potential encounter per hour. If an additional encounter did occur drivers can wait and give-way using the existing passing places or existing two lane sections of carriageway.

Therefore based on the assessment it is not considered that the development would lead to a material impact on the highway network in terms of capacity, delay or road safety.

Opportunities to improve the existing network have been considered and it is proposed that the development could widen Mill Lane and Hyde Lane (south) along the development frontage. In these areas the carriageway could be widened to 4.1m allowing two cars to pass. This would remove an existing pinch point on Mill Lane and formalise the passing places on Hyde Lane and improve the network surrounding the site.

1 Introduction

1.1 Overview

- 1.1.1 Cannon Consulting Engineers (CCE) is appointed to provide highways and transportation advice to Stonebond Properties (Chelmsford) Ltd, in support of the promotion a parcel of land located to the south of Mill Lane, Danbury, which is currently being considered for allocation by the Danbury Neighbourhood Plan working group under reference D9. The land at D9 comprises two files with landscaped boundaries extending to 3.4ha in total. The location of the site is shown below:



Image 1.1 – Site Location Plan (mapping source www.google.com/maps accessed 28/01/21)

- 1.1.2 The Danbury Neighbourhood Plan (DNP) is being created to identify sites for development in the Parish of Danbury. Danbury has been identified for housing growth of around 100 units. As part of this process developers and land owners were invited to submit development proposals on potential sites with a preference of sites with no more than 30 units. Whilst Stonebond Properties control the full site, a proposal for 30 homes has been put forward to the DNP working group on the western field only, which has a site area of 1.9ha. This approach was taken to provide for a proportionate development site to meet the aspirations of the Neighbourhood Plan and reflect the density of the local area.
- 1.1.3 The DNP's Working Group have reviewed site D9 and in doing so have consulted with Essex County Council as the Local Highway Authority. In their response dated the 24th December

2020 they include comments received from Essex County Council (ECC) Highways which states:

D9 – (RAG red) The Highway Authority would not support an application for dwellings with access from Mill Lane or Millfields. The capacity of the wider local highway network (Hyde Lane, Mill Lane, The Avenue) would indicate that this site is not suitable.

1.1.4 In response to ECC comments CCE prepared Technical Note 1 (see Appendix A) to provide an overview of the existing conditions and estimated vehicle impact of the development proposals on the wider network. Further to this CCE and Stonebond Properties met with ECC, on the 21st April 2021, to discuss their comments and CCE's response. ECC explained that their concerns where:

- whether the local road network can support the proposed development; and
- whether the local footway network was suitable / attractive to pedestrians.

1.1.5 Following the meeting with ECC, CCE commissioned a new traffic survey of the existing road network to establish current baseline conditions, which include traffic volumes and vehicle speeds. A site visit has been carried out to record the condition of the existing walking and carriageway provision, from which improvements have been considered which could be provided by the Mill Lane, Danbury site.

1.1.6 This Technical Note presents this information, which seeks to:

- Analyse the existing footway network and pedestrian accessibility and recommend where improvements can be made, either by the site or the local authority; and
- Analyse the road network leading from the site and to identify where improvements can be made and that can be delivered by the development.
- Calculate the impacts of the trips associated with the development on the local road network

2 Existing Pedestrian Network

2.1 Introduction

2.1.1 As noted in Section 1, ECC considered the information presented in Technical Note 1 and whilst they acknowledged that they would welcome improvements they would need to be provided with more information, including an assessment of the existing footway provision as they considered that it was narrow or in poor condition.

2.1.2 In combination with the traffic surveys a site visit was carried out on the 26th May 2021 to consider the existing footway links from the site to the key facilities and services, which include:

- Tesco Express – 640m or 9min walk;
- Existing Bus Stops – 800m or 10min walk
- Primary School – 1200m or 17min walk
- Leisure / Gym – 1400m or 19min walk.

2.1.3 The following two routes have been considered:

- Route 1 – Mill Lane and The Avenue: and
- Route 2 – Existing PROW link to Hoynors

2.1.4 The review considers the national inclusive mobility guidance, which at Section 2.2 states:

“Someone who does not use a walking aid can manage to walk along a passage way less than 700mm wide, but just using a walking stick requires greater width than this; a minimum of 750mm. a person who use two sticks or crutches, or a walking frame needs a minimum of 900mm, a blind person using a long cane or with an assistance dog needs 1100mm. A visually impaired person who is being guided needs a width of 1200mm. A wheel chair user and an ambulant person side-by-side need 1500mm width”.

2.1.5 Section 3.1 provides guidance on footway widths which states:

“A clear width of 2000mm allows two wheel chairs to pass one another comfortably. This should be regarded as the minimum under normal circumstances. Where this is not possible because of physical constraints 1500mm could be regarded as the minimum acceptable under most circumstances, giving sufficient space for wheelchair users and walkers to pass one another. The absolute minimum, where there is an obstacle should be 1000mm clear space. The maximum length of restricted width should be 6 metres (see also Section 8.3)”.

2.1.6 In addition the review considers a Health Streets Check (HSC) type audit of the route. The HSC process has been developed by Transport for London (TfL) and includes a number of indicators

which allow an assessment of the overall environment to be created. This is typically used for much busier locations and not all of the indicators are applicable. Where this is the case the lowest value has been selected. This review provides a score for the route or partial sections of the route. The purpose of the check/score is to identify areas where improvements can be made and that will have a benefit to the end users. In this case the benefit will be to encourage walking and cycling, not only from residents of the proposed development site but existing residents.

2.1.7 This section provides a summary of the assessment and proposed improvements which can be provided by the development.

2.2 Existing Footway Network.

2.2.1 The recorded personal injury accident data has been reviewed (see Section 3.6) which shows there have been no accidents on Mill Lane, The Avenue or Hoynors. It is therefore considered that there are not any existing road safety issues.

2.2.2 A site visit was undertaken to record the existing

- footway widths;
- footway condition;
- crossing provision,
- obstructions (caused by vegetation or street furniture or parking)

2.2.3 The spot measurements have been used to update the base mapping to provide a more accurate overview of the existing provision which has been used in the assessment of the link. As noted in section 2.1 there are two routes which have been considered, which provide access to the local facilities and services. These routes have been split into the following sections and are summarised on drawing ZA931_PL_SK_200:

- Section 1 – Mill Lane (from the Site to the Avenue);
- Section 2 – The Avenue (from Mill Lane to the A414);
- Section 3 – PROW (between Mill Lane and Hoynors);
- Section 4 – Hoynors (between PROW and the A414).

2.3 Section 1 – Mill Lane

Footway widths

2.3.1 The existing footway provision on Mill Lane is presented on drawing ZA931_SK_PL_201. The width of the footway has been reviewed as a linear length meeting the following criteria:

- Length between 1.5m and 2.0m;
- Length between 1.2m and 1.5m;
- Length between 1.0 and 1.2m; and
- Length less than 1.0m

2.3.2 The summary of the footway width is presented below:

Criteria	Length	Percentage of Route
Between 1.5m and 2.0m	252m	51.1%
Between 1.2m and 1.49m	224m	45.4%
Between 1.0m and 1.19m	17m	3.5%
Less than 1.0m	0m	0%
Total	493	100%

Table 2.1 – Existing Footway Width Summary – Mill Lane

2.3.3 The summary above shows that 252m or (51.1%) of the route is at least 1.5m wide, which represents the generally accepted width for a pedestrian to pass a wheel chair. A further 224m (45.4%) is between 1.2m and 1.49m wide, which as prescribed inclusive mobility can cater for vulnerable users. As such 96.5% of the link can accommodate vulnerable users as prescribed in the national inclusive mobility guidance. A section of the route, totaling 17m, is 1.0m wide which is located adjacent to properties 79 and 81. Although this section is longer than the recommend 6m it is not considered that this detracts from the attractiveness of the route, when considered with the pedestrian demand and low traffic flows. This narrow section has a verge to the rear which has marker posts and a telegraph pole set back indicating the possible land boundary.

2.3.4 The plot adjacent to this is currently being developed and there is no obligation for them to improve this section, therefore over a short distance is considered acceptable.

2.3.5 The section of footway to the north of Pedlars Path was restricted by vegetation which has been poorly maintained and is reducing widths from 1.6m to around 1.2m. This section measuring 17m in length should be maintained by the property owner so that the footway is

maximised. If trimmed back this would change increase the provision within 1.5m to 2.0m to 54.5%. This section is shown on the image below:



Image 2.1 – Vegetation Overgrown

Pedestrian Crossing Provision

2.3.6 The existing crossing provision has been reviewed along this link as summarised below, along with possible improvements:

Road / Crossing Point	Existing Provision	Proposed Provision
Millfields	No dropped kerbs / tactile paving	Provide new uncontrolled crossing (new dropped kerbs and tactile paving)
Pedlers Path	No dropped kerbs / tactile paving	Provide new uncontrolled crossing (new dropped kerbs and tactile paving)
Crossing to PROW	No tactile paving	N/A - Due to the location of existing drives tactile paving cannot be provided
Mill Lane (east of The Avenue)	No dropped kerb / tactile paving	Provide new uncontrolled crossing (new dropped kerbs and tactile paving)

Table 2.2 – Existing Pedestrian Crossing Provision – Mill Lane

2.3.7 The review of existing crossing facilities shows that are currently no dropped kerbs or tactile paving to assist pedestrians crossing. To improve the crossing locations dropped kerbs and tactile paving could be installed as shown on drawing ZA931_SK_PL_202.

Footway Condition Survey

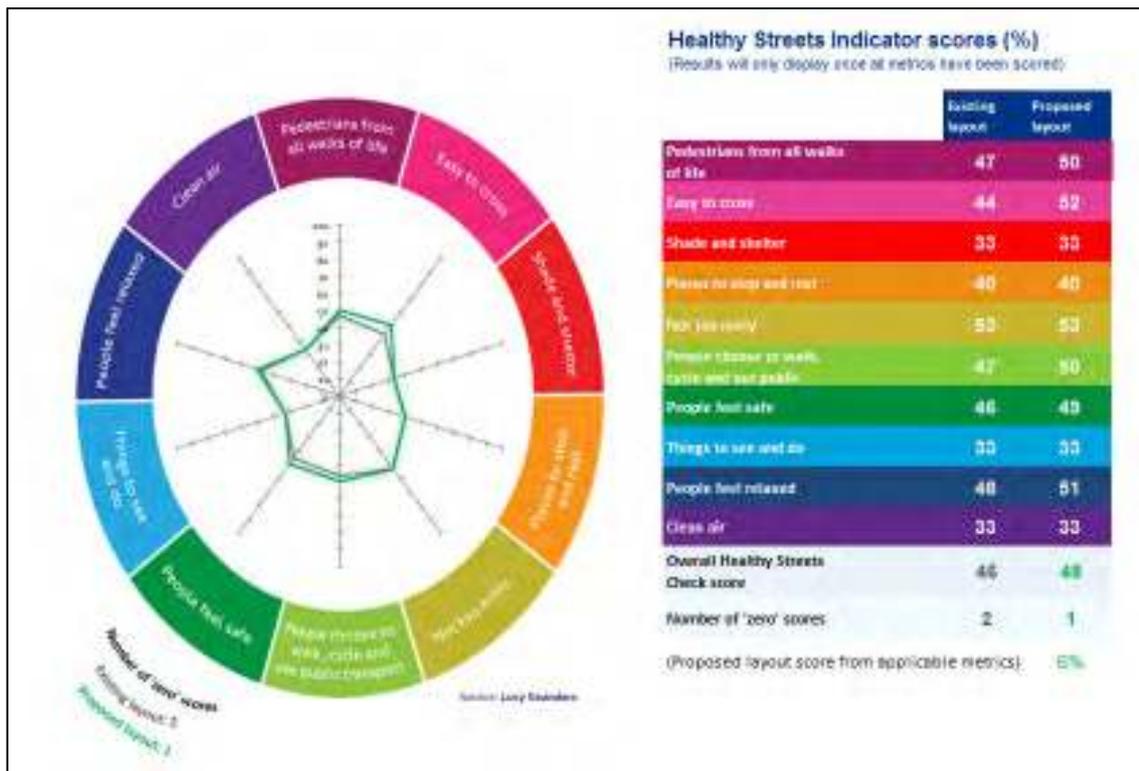
2.3.8 During the survey it was noted there were some areas of footway which could benefit from maintaining (trimming vegetation, clearing debris) or resurfacing. These are summarised on drawing ZA931_PL_SK_201 and shown on the image below:

	
<p>Image 2.2 – Footway 20m north of Millfields</p>	<p>Image 2.3 – At Pedlers Path Junction</p>
	
<p>Image 2.4 – Raised</p>	<p>Image 2.5 – At Pedlers Path Junction</p>

- 2.3.9 The images above show two areas that have poor surfacing, one which has a raised service cover and one where the stones from driveway have been pulled out onto the path. The resurfacing required at the location shown in Image 2.2 and 2.3 could be combined with the provision of dropped kerbs and tactile paving at Millfields and Pedlers Path, which could be secured by S.106 or condition. These areas are shown on drawing ZA931_PL_SK_202. The ingress of stone from driveways is a maintenance liability of those properties and they should be required to keep the public highway clear of this debris. This should be enforced by the highway authority.
- 2.3.10 The review above provides a summary of the existing condition of the walking route, which shows that the majority of the route can accommodate vulnerable users. Notwithstanding this, the review has identified areas which could be improved through the provision of uncontrolled crossings, resurfacing and improved maintenance. The provision of uncontrolled crossing upgrades was discussed with ECC however they questioned whether this would result in the route becoming more attractive to pedestrians.
- 2.3.11 Whilst ECC do not have adopted guidance which would allow the benefits to be quantified, Transport for London (TfL) have developed the Healthy Streets Check (HSC) toolkit. The HSC toolkit uses 32 metrics to assess the existing conditions / environment of the link based on set criteria. Based on these criteria each metric is scored with a value of 0-3. These metric scores are converted into a score against 10 indicators, which are then plotted on a radar plot. The process for converting the score is illustrated on the metric / indicator matrix contained at Appendix B.
- 2.3.12 The HSC process is repeated with proposed improvements included. This results in an updated score which can be compared to the existing to see where the benefits are likely to be made. It should be noted that there is not a correct or target score. The HSC has been designed as a tool to allow designers to review the benefits of new schemes to show that they can deliver improvements to the network.

Health Streets Check – Mill Lane

- 2.3.13 AS noted above the HSC approach has been used to score the existing Mill Lane footway. This process has been repeated to include the proposed improvements. Where a metric is not applicable the lowest score has been used (0). The output of this review is shown below.



Graph 2.1 – Existing / Proposed Mill Lane Assessment

2.3.14 The graph above shows that the exiting route score is 46 with two metrics scoring 0. If the crossing locations and areas of surfacing are maintained then the overall score would increase to 48 (an increase of 6%) or would increase against the following indicators:

- Pedestrians from all walks of life – increases from 47 to 50 (6%);
- Easy to Cross – increases from 44 to 52 (18%);
- People choose to walk – increases from 47 to 50 (6%);
- People feel safe – increases from 46 to 49 (7%);
- People feel relaxed – increases from 48 to 51 (6%).

2.3.15 In summary the provision of uncontrolled crossing points would result in an increase to 5 indicators by a maximum of 18%. It is considered that this review demonstrates that the proposed would provide a significant benefit to all users.

2.4 Section 2 – The Avenue

Footway widths

2.4.1 The existing footway provision on The Avenue is presented on drawing ZA931_SK_PL_202. In summary the eastern footway is at least 2.0m wide for the length of the footway between Mill Lane and the A414. Along the route there are a number of drive ways and trees are located along the route. The trees provide a minor obstruction and the width behind the tree to the

highway boundary / property fence/wall is at least 1.0m wide, which is in accordance with inclusive mobility guidance.

Pedestrian Crossing Provision

2.4.2 The existing crossing provision has been reviewed along this link as summarised below, along with possible improvements:

Road / Crossing Point	Existing Provision	Proposed Provision
At Mill Lane Jct	No dropped kerbs / tactile paving	upgraded to include dropped kerbs and tactile across The Avenue (east/west movement)
At A414 junction	No dropped kerbs / tactile paving across existing belmouth	upgraded to include dropped kerbs and tactile across The Avenue (east/west movement)

Table 2.3 – Existing Pedestrian Crossing Provision – The Avenue

2.4.3 The review of existing crossing facilities shows that are currently no dropped kerbs or tactile paving to assist pedestrians crossing at the junction of Mill Lane or the junction with the A414. To improve the crossing locations dropped kerbs and tactile paving could be installed as shown on drawing ZA931_SK_PL_203 and summarised in the table above.

Footway Condition Survey

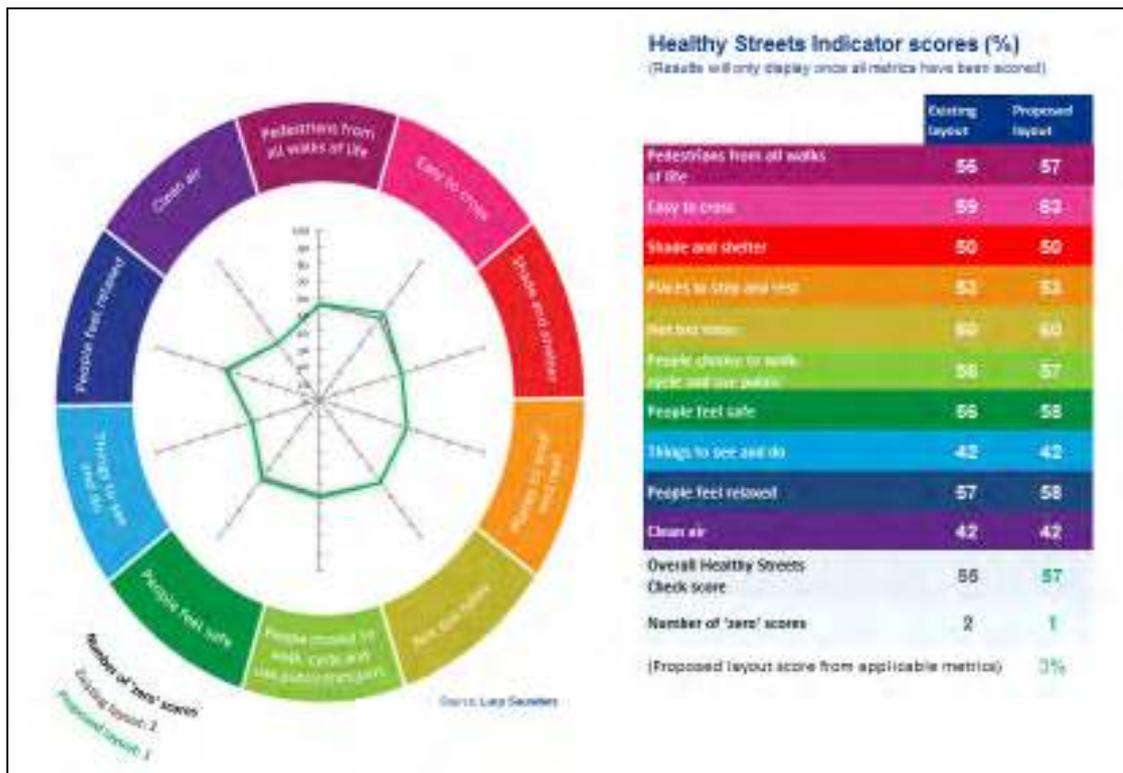
2.4.4 The condition of the footway was observed and was considered to be in generally good condition, as illustrated below:



Image 2.6 - Existing Footway Surface - The Avenue

Health Streets Check – The Avenue

- 2.4.5 The existing route as described above has been scored and then process has been repeated taking the possible improvements into account. Where a metric is not applicable the lowest score has been used (0). The output of this review is shown below.



Graph 2.2 – Existing / Proposed The Avenue Assessment

2.4.6 The graph above shows that the exiting route score is 55 with two metrics scoring 0. If the crossing locations improved then the overall score would increase to 57 (an increase of 3%) or against the following indicators:

- Pedestrians from all walks of life – increases from 56 to 57 (2%);
- Easy to Cross – increases from 59 to 63 (6%);
- People choose to walk – increases from 56 to 57 (2%);
- People feel safe – increases from 56 to 58 (4%);
- People feel relaxed – increases from 57 to 58 (2%).

2.4.7 The summary above shows that the provision of uncontrolled crossing points could improve the attractiveness of the route and could encourage walking.

2.5 Section 3 – Existing PROW (between Mill Lane and Hoynors)

Footway widths

2.5.1 The existing PROW between Mill Lane and Hoynors is shown on drawing ZA931_SK_PL_204.the link measures approximately 100m in length and varies in width between 1.5 and just over 2m wide, which is considered to be in accordance with the guidance.

- 2.5.2 The link has existing trees and hedges along the link and through maintenance these should be trimmed to maximise the available footway with, debris from the trees builds up on either side of the footway and therefore this should also be maintained as part of ECC ongoing maintenance. In addition although street lighting is present it is obscured by the existing tree canopy. ECC should cut the existing trees back to maximise the effectiveness of the street lighting. This will also improve the attractiveness of this route. The site could pay a contribution towards this maintenance.

Pedestrian Crossing Provision

- 2.5.3 As noted in Section 2.3 there is currently no crossing provision at Mill Lane (to the south of the Link). At the northern end the link connects to the exiting footway network on Hoynors. Due to the location of the existing accesses, on the southern side of the junction, it is not possible to install tactile paving.

Footway Condition Survey

- 2.5.4 The condition of the footway was observed and was considered to be in generally good condition, as illustrated below. As noted in paragraph 2.5.2 there are existing trees and vegetation which required ongoing maintenance to trim back and also to remove falling leaves etc.



Image 2.7 - Existing Footway Surface – PROW Link

Health Streets Check – PROW

2.5.5 No improvements to this section have been identified and therefore the HSC has not been carried out for this section.

2.6 Section 4 – Hoynors (between PROW and the A414 (western footway))

Footway widths

2.6.1 As noted in Section 2.5 the existing PROW connects to the western footway on Hoynors which provides a link to the A414. The existing footway is approximately 1.8m wide with street lighting columns located to the rear. There are a number of vehicle crossovers to private dwellings, however there are no side roads along this section. As such the existing footway provision is considered to be in accordance with inclusive mobility guidance.

Pedestrian Crossing Provision

2.6.2 As noted above there are no side roads along this section of Hoynors. An uncontrolled crossing comprising dropped kerbs and tactile paving is provided at the junction with the A414. This accommodates the east / west movement along the A414 and is considered to be suitable.

2.6.3 As a result no pedestrian crossing improvements are considered necessary.

Footway Condition Survey

2.6.4 The condition of the footway was observed and was considered to be in generally good condition. As a result no footway works are considered necessary on this link.

2.7 Summary

The existing footway links have been reviewed and no existing road safety issue has been highlighted based on the accident data. However the following improvements are proposed:

- To provide new uncontrolled crossing at Millfields, Pedlars Path, Mill Lane (east of The Avenue) and The Avenue (at the junction with the A414);
- To resurface two sections of footway (to the west of Millfields and to the east of Pedlars Path); and
- To pay a contribution towards the maintenance of the existing vegetation.

The effects of these proposals have been reviewed using TfLs Healthy Streets Check toolkit which shows a benefit for pedestrians of up to 18%. Therefore it is considered the proposals provide a significant benefit for all users

3 Carriageway Assessment

3.1 Introduction

3.1.1 This section provides a summary of carriageway assessment which includes:

- a review of the existing spot widths on each link
- a review of the passing opportunities which exist either formally or informally;
- a review and comparison of 2017 and 2021 survey information;
- an assessment of the likely impact resulting from the development including changes to the probability of vehicle encounters on each link.

3.1.2 The review of the carriageway provision has been considered against the National Planning Policy Framework (NPPF). Paragraph 108 states that *“In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:*

- a) Appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
- b) Safe and suitable access to the site can be achieved for all users; and*
- c) Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.”*

3.1.3 Paragraph 109 states that *“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. “*

3.1.4 In addition the adopted Chelmsford Local Plan seeks to protect non designated heritage assets as set out in Policy DM14. Paragraph 8.92 of the Local Plan states:

The focus of the policy is based on the protection and retention of non-designated heritage assets as identified on the Council’s Buildings of Local Value List, Inventory of Landscaping of Local Interest and Protected Lanes Studies.

3.1.5 Essex County Council’s Place Services Historic Environment Team was commissioned by Chelmsford City Council to undertake an assessment of six lanes within Danbury in 2017. Hyde Lane was identified as one of the lanes reviewed however following the initial review it did not score high enough and as a result was not taken forward to the second stage of the assessment.

3.1.6 As a result, none of the links identified in the Essex Highways response were recommended to become a protected lane.

3.2 Existing Local Road Network Review

3.2.1 The site is located to the south-east of Danbury and is bound by Mill Lane (to the north), Hyde Lane (to the east), Millfields (to the west) and woodland / a private dwelling to the south. From the site the wider highway network is accessed from the following Links:

- Mill Lane;
- The Avenue;
- Hyde Lane (north); and
- Hyde Lane (south).

3.2.2 A site visit was carried out to observe the current operation and to record existing spot widths and the existing passing opportunities, the extent of the review is shown on drawing ZA931_PL_SK_200.

3.3 Mill Lane

3.3.1 Mill Lanes runs in an approximate east-west direction from its junction with Hyde Lane (to the east) Gay Bowers Lane (to the west). It is split into three distinct sections, namely:

- Section 1 – between Gay Bowers Lane and The Avenue;
- Section 2 – between The Avenue and Millfields; and
- Section 3 – between Millfields and Hyde Lane.

3.3.2 The existing Mill Lane road network is presented on drawing ZA931_PL_SK_205. A summary of the existing conditions on each section is provided below.

Section 1 – Mill Lane

3.3.3 The section between Gay Bowers Lane and The Avenue is characterised as a single carriageway with passing opportunities and is subject to a 30mph speed limit. This section measures approximately 306 metres in length of which 140m (46%) is single carriageway and 166m (54%) is either wider than 4.1m or includes a passing area which allows vehicles to pass. Of the 166m section where passing is possible approximately 65m (39%) is at least 4.1m wide. This section is located immediately west of The Avenue and runs along the existing property frontage. The remaining passing areas (61%) comprise informal passing areas and driveways.

3.3.4 The greatest distance between passing areas is approximately 37 metres, which based on the observed speed data is within the stopping site distance prescribed in Manual for Streets (MfS). Operation of this section of highway was observed including interactions between vehicles. These all occurred within the formal / informal passing areas and no issue were observed.

- 3.3.5 There is not footway or street lighting provision along this section. In addition there is an existing 'unsuitable for HGVs' sign at the western end of Mill Lane.

Section 2 – Mill Lane

- 3.3.6 The existing carriageway between The Avenue and Millfields varies in width from approximately 4.4m and 5.0m, which allows two vehicles to pass. This section is approximately 500m in length and is subject to a 30mph speed limit and there is street lighting provision. There is a continuous footway on the southern side of the road and partial footway link on the northern side, which is described in section 2.
- 3.3.7 During the site visit limited on street parking was observed, however this did not affect the operation of the road. The presence of on street parking can help to maintain lower vehicle speeds and therefore improving safety.
- 3.3.8 Based on a visual inspection the carriageway is in good condition although no testing was carried out in terms of skid resistance.

Section 3 –Mill Lane

- 3.3.9 The section between Millfields and the junction with Hyde Lane is approximately 200m in length which is split as follows:
- The first section from Millfields, extending 75m east to property no:6 measures approximately 4.4m in width, allowing two vehicles to pass;
 - The middle section, approximately 65m in length narrows to between 3.2 and 3.5m. this section doesn't allow two vehicles to pass, however there is good visibility along this section; and
 - The third section up to Hyde Lane measures between 4.1 and 4.2m in width, allowing two vehicles to pass.
- 3.3.10 A footway is located on the northern side of the road extending from Millfields to property No:6. The footway provision on the southern side stops at the eastern corner of Millfields at the end of the junction radii. The proposed development controls the land needed to extend this footway into the site.
- 3.3.11 This section of Mill Lane is subject to a 30mph speed limit and there is no street lighting.

3.4 The Avenue

- 3.4.1 The Avenue forms a connection between Mill Lane and the A414 primary route corridor, as presented on drawing ZA931_SK_PL_201. The Avenue is approximately 170m in length and between 7.1m and 7.3m wide. There are 28 properties on this link, of which 27 have driveways and off carriageway parking.
- 3.4.2 On carriageway parking is present on both sides of the carriageway although these are not marked. During the site visit the number of on carriageway parking spaces was estimated as

to be a maximum of 30 spaces of which 18 (60%) were occupied. The space created by the presence of driveways along with areas not used for parking provide passing areas for vehicles to pass. The Avenue is subject to a 30mph speed limit with street lighting. The on street parking provides traffic calming for an otherwise straight wide road, which is reflected by the observed vehicle speeds.

- 3.4.3 A footway is located on both sides of the road which is approximately 2m wide. The street is tree lined and the footway narrows briefly around these.

3.5 Hyde Lane (north and south)

- 3.5.1 Hyde Lane forms a junction with Mill Lane to the north-east of the site. From this point Hyde Lane runs north forming a priority T-junction with Cherry Garden Lane and the A414. To the south Hyde Lane forms a priority T-junction with the B1418. Hyde Lane varies in width. A site visit was carried out, on the 26th May 2021, to record spot widths and the location of passing areas which are described below:

Hyde Lane north

- 3.5.2 The section of Hyde Lane, between Mill Lane and Cherry Garden Lane measures approximately 560m long, as presented on drawing ZA931_SK_PL_202. The majority of the route provides access to existing properties and development access roads and is subject to a 7.5t weight limit. A review of the route was carried out where it is estimated that approximately 290m (52%) is single lane carriageway with the remaining (48%) provision allowing two vehicles to pass. The formal sections, at least 4.1m wide, are located at the existing junctions of Barley Mead, Dilston, Hyde Green and The Hawthorns.
- 3.5.3 The remaining passing areas are formed by informal overrun areas which are spaced along the route. The maximum spacing between passing opportunities is approximately 70m which is the section from Mill Lane to property No:40. Visibility along the route is generally good although is reduced in some locations through the alignment of the road and vegetation. Vegetation appears to be in third part ownership.

Hyde Lane south

- 3.5.4 The section of Hyde Lane, between Mill Lane and Cheery Garden Lane measures approximately 730 in length.
- 3.5.5 This section of Hyde Lane is characterised as a rural road providing access to fields and some rural properties. It is subject to the National Speed Limit (NSL), although speed survey data indicates that vehicles are travelling at much lower speeds, in keeping with the environment. As noted above Hyde Lane operates with a 7.5t weight restriction.
- 3.5.6 A review of the route was carried out where it is estimated that approximately 294 (40%) is single carriageway and the remaining 436m (60%) is either at least 4.1m or has a passing area. This section of Hyde Lane is presented on drawing ZA931_SK_PL_203.

3.6 Personal Injury Accident (PIA) Review

3.6.1 The Safer Essex Roads Partnership (SERP) has developed the saferessexroads.org website in partnership with Essex County Council, Southend-On-Sea Borough Council and Thurrock Council. Other partners include Essex Police, Essex County Fire and Rescue Service (ECRFS), Highways England and Essex & Herts Air Ambulance. The website provides an overview of the accident location for the most recent 5 year period (01/01/2015 – 31/12/2019). This information has been reviewed to determine whether there have been any accidents on the adjacent links considered in this note. An extract from the website is shown below:

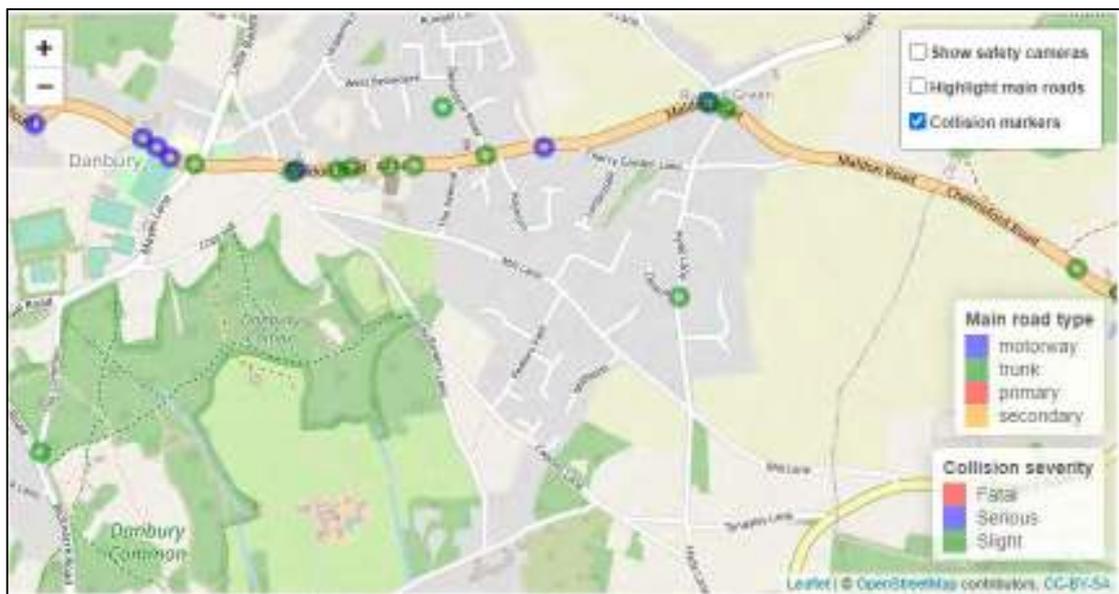


Image 2.1 – 5yr Accident Data Extract (source saferessexroads.org accessed 28/01/21)

3.6.2 The online mapping shows that there have been no accidents recorded on Mill Lane, The Avenue or the southern section of Hyde Lane. The data records 1 accident on the northern section of Hyde Lane which involved 2 vehicles and occurred at the junction with Dilston suggesting it was associated with a turning movement. The accident occurred on the 8th September 2019 and was slight in severity.

3.6.3 The review of the accident data suggests that there are no existing road safety concerns associated with Mill Lane, Hyde Lane or the Avenue.

3.7 Existing Traffic Flows

3.7.1 Traffic Flow data recorded in October 2017 was presented in Technical Note 1 to provide an overview of the existing operation of the following links:

- Link 1 – Mill Lane (West of the Avenue);
- Link 2 – The Avenue;
- Link 3 – Mill lane

- Link 4 – Hyde Lane (50m North of Mill Lane); and
- Link 5 – Hyde Lane (50m South of Mill Lane).

3.7.2 At the time of preparing Technical Note 1 it was not possible to carry out new traffic surveys. However with lockdown easing new Automatic Traffic Count (ATC) surveys have been carried out on these 5 links to establish the current operation. It is considered that this provides a useful current baseline in terms of traffic volumes and vehicle speeds are unlikely to be affected by the pandemic.

3.7.3 CCE commissioned the ATC surveys to be carried out in May 2021, commencing on the 20th May and running for a 7 day consecutive period. The 2021 AM peak (0800-0900) data has been compared to the 2017 data below:

	Direction	2017	2021	Change
Link 1 – Mill Lane	WB	83	64	-19
	EB	18	29	+11
	Two-way	101	93	-8
Link 2 – The Avenue	NB	21	17	-4
	SB	18	28	+10
	Two-way	39	45	+6
Link 3 – Mill Lane	EB	30	20	-10
	WB	103	34	-69
	Two-way	133	54	-79*
Link 4 – Hyde Lane (N)	NB	22	11	-11
	SB	33	18	-15
	Two-way	55	29	-26
Link 5 – Hyde Lane (S)	NB	26	19	-7
	SB	27	22	-5
	Two-way	53	41	-12

Table 3.1 – Comparison of 2017 and 2021 Vehicle Trips

3.7.4 The comparison above shows that the 2021 vehicle trips on Links 1 (Mill Lane) and Link 2 (The Avenue) are comparable to those recorded in 2017. However there has been a reduction on the two Hyde Lane Links, where vehicle movements on Link 4 (Hyde Lane north) is 26 vehicles lower (-47%) and on Link 5 (Hyde Lane south) is 12 vehicle movements lower (-23%).

3.7.5 There is a larger discrepancy of trips on Link 3 (Mill Lane). This is likely to be due to the location of the survey (the 2012 data was taken to the west of Pedlars Path).

3.7.6 The ATC surveys recorded vehicle speeds for each link which are summarised below as average vehicle speeds and 85th percentile speeds:

	Mean Speed (two-way)	85 th Percentile Speed (two-way)
Link 1	23	28
Link 2	20	24
Link 3	24	30
Link 4	20	25
Link 5	23	29

Table 3.2 – 2021 Vehicle Speed Summary

3.7.7 The speed data summarised above shows that the mean vehicle speed on all links is below 24 mph and the 85th percentile speeds on all links is 30mph or below. With the exception of Link 5 all roads are subject to a 30mph speed limit and therefore this summary shows that drivers are travelling through the network within the posted speed limit and in accordance with the local environment.

3.8 Link Capacity

3.8.1 There is limited adopted guidance on the link capacity of single lane carriageway sections with passing places. Richard Sweet (Somerset County Council) reviewed the existing research on single lane capacity and used a micro simulation model to test the ranges quoted in the research. This information was presented at a TRIC’s conference (a copy of the presentation is contained at Appendix C), where he concluded that:

- Effective capacity of a single lane track with passing places is between 100-300 vehs per hour;
- Capacity is significantly affected by tidal flow and where the difference between opposing flows is greatest (such as Mill Lane (west) see table 3.1) the capacity will be at the higher end; and
- Delay increases when the two-way flow is greater than 400 veh/hr.

3.8.2 As summarised in Table 3.1 the flow on the links is less than 100 with the exception of Link 1 (Mill Lane west) where the two-way flow is 101 vehicles, which is split 82% westbound and 18% eastbound. Therefore the existing links are well within the capacity ranges quoted above. The existing flows are significantly lower than 400 veh/hr and therefore it is not expected that there is significant delay.

3.9 Proposed Vehicle Trips and Network Assignment

3.9.1 The site is being promoted for a residential development of up to 30 units which is in line with the expectations of the DNP. It is proposed to access the site from Mill Lane in the north-west corner, where a new priority controlled T-junction will be created. The location of the junction provides good visibility along Mill Lane in accordance with the Essex County Council Design Technical guidance. The access road into the development will be to Essex County Councils Type E road specification which is suitable for the scale of development. Footways will be provided, which will tie in with the existing provision to the west of the site.

3.9.2 An ATC survey of Barley Mead was carried out in October 2017 to observe all vehicle movements in and out of the existing development. Barley Mead comprises 38 residential properties which is slightly larger, but comparable to the development proposals being considered at Land to the South of Mill Lane.

3.9.3 The observed traffic movements have been used to estimate a local trip rate, which has been compared to trips derived from TRICs. These are summarised below:

	Local Trip Rate		TRICs Trip Rate		Difference	
	Arrive	Depart	Arrive	Depart	Arrive	Depart
AM Peak	0.083	0.338	0.114	0.426	-0.061	-0.088
PM Peak	0.459	0.218	0.403	0.263	+0.056	-0.045

Table 3.3 – Trip Rate Summary

3.9.4 The summary above shows that the local trip rates are lower in the AM peak and marginally higher in the PM peak. Although it is considered reasonable to use the locally derived trip rates the TRICs trip rates have been used to form a robust appraisal of the likely impacts resulting from the development.

3.9.5 The trip attraction of the site has been estimated using the TRICs derived trip rates for a development of up to 30 units, as summarised below.

	AM Peak			PM Peak		
	Arrive	Depart	Two way	Arrive	Depart	Two way
AM	3	13	16	12	8	20

Table 3.4 – Development Trips (30 Units)

3.9.6 The table above shows the development is likely to generate 16 two way trips in the AM peak and 20 two way trips in the PM peak.

3.9.7 The vehicle trips have been distributed onto Mill Lane, The Avenue and Hyde Lane using the 2017 two-way link flows as summarised below:

	AM peak	PM peak
	(vehs)	(vehs)
Link 1 – Mill Lane (W)	7	8
Link 2 – The Avenue	2	3
Link 4 – Hyde Lane (N)	3	4
Link 5 – Hyde Lane (S)	4	5
Total	16	20

Table 3.5 – Development Distribution and Combined Link Flow Summary

3.9.8 The vehicle trips and distribution was presented in Technical Note 1 along with a simple frequency calculation to seek to demonstrate that the impact of the development was low and that it would not severely impact the local highway network as prescribed in NPPF. ECC generally accepted the distribution which has the greatest impact on Link 1. When these 7 trips are added to the link the two-way total increase to 108 vehicles. This is within the capacity range of up to 300 two-way trips and significantly less than 400 two-way movements and therefore the trips associated with the potential development will not affect the capacity or delay on the existing network.

3.10 Development Impact on Highway Links Frequency

3.10.1 The change in frequency between the existing traffic movements and those with the proposed development were presented in Technical Note 1, which is contained at Appendix A. a comparison of the impact on vehicle frequencies is summarised below, which has been expressed as the change frequency (time per vehicle entering the link):

	AM peak			PM peak		
	Existing Frequency	Proposed Frequency	Change	Existing Frequency	Proposed Frequency	Change
Link 1 – Mill Lane (W)	1 vehicle every 0.59 mins	1 vehicle every 0.55 mins	-0.04 (2.4 sec)	1 vehicle every 0.81 mins	1 vehicle every 0.73 mins	-0.08 (4.8 sec)
Link 2 – The Avenue	1 vehicle every 1.54 mins	1 vehicle every 1.43 mins	-0.11 (6.6 sec)	1 vehicle every 1.39 mins	1 vehicle every 1.30 mins	-0.9 (5.4 sec)
Link 4 – Hyde Lane (N)	1 vehicle every 1.09 mins	1 vehicle every 1.03 mins	-0.06 (3.6 sec)	1 vehicle every 1.40 mins	1 vehicle every 1.28 mins	-0.12 (7.2 sec)
Link 5 – Hyde Lane (S)	1 vehicle every 1.13 mins	1 vehicle every 1.05 mins	-0.08 (4.8 sec)	1 vehicle every 1.22 mins	1 vehicle every 1.11 mins	-0.11 (7.2 sec)

Table 3.6 – Vehicle Link Flow Frequency Existing v Proposed

3.10.2 The vehicle link flow frequencies summarised above show that the existing AM peak frequencies are between 1 vehicles every 0.59 and 1.54 minutes in the AM peak and between 0.81 and 1.40 minutes in the PM peak. When the trips associated with the proposed development are included the frequency of vehicles increase by between 2.4 and 6.6 seconds in the AM peak and by 4.8 to 7.2 seconds in the PM peak. It is not considered that the predicted change in frequency will have a material impact on the operation of the links.

3.10.3 Another measure to consider is the chance of two vehicles encountering each other on a link which has been considered below.

3.11 Development Impact on Highway Link Probability of Encountering opposing vehicle.

3.11.1 The development trips rates and network assignment are summarised above. A site visit was carried out to record the width of the existing road network and to log the existing passing opportunities on the route. The existing network is presented on drawings ZA931_PL_SK_200-205. Using this information the probability of opposing vehicles meeting on the single lane sections of each link and how this is impacted by the vehicles associated with the proposed development. The link is considered to be single lane where:

- The carriageway is less than 4.1m wide. (4.1m is prescribed in Manual for Streets and the recommend width for two cars to pass each other); or
- Where there isn't a passing bay/area where there was sufficient width / evidence of passing.

3.11.2 The probability calculation for each links is summarised below:

		Link 1	Link 2	Link 4	Link 5
2017 Existing Flows	Dominant Flow	83	21	33	27
	Non-dominant flow	18	18	22	26
Link Length	Total	306	167	561	730
	Single Lane	140	167	291	294
Speed	MPH	23	20	20	23
	m/sec	10.3	8.9	8.9	10.3
Total Travel Time	Per Veh	13.6 sec	18.7 sec	32.5 sec	28.6 sec
	Dominant Movement	1130 sec	392.2 sec	1074 sec	772 sec
Existing Probability	1 opposing vehicle meeting	0.12%	0.06%	0.27%	0.17%
	All opposing vehicles	2.14%	1.02%	5.93%	4.43%
Existing + Pro Dev	Dominant Flow	88	23	34	30
	Non-dominant flow	19	18	26	27
Proposed Probability	1 opposing vehicle meeting	0.13%	0.07%	0.28%	0.19%
	All opposing vehicles	2.52%	1.18%	6.95%	5.11%
Change	1 opposing vehicle meeting	0.01%	0.01%	0.01%	0.02%
	All opposing vehicles	0.38%	0.16%	1.01%	0.68%

Table 2.6 – Change in vehicle encounter probability (Existing v Proposed)

3.11.3 The table above provides a summary of the probability of opposing traffic movements encountering each other on each link, which is presented as a single vehicle or all opposing vehicles encountering the dominant traffic movement. This shows that the:

- Probability of a single car meeting an opposing vehicle increases by:
 - 0.01% on Link 1, 2 and 4; and
 - 0.02% on Link 5.
- Probability of any vehicle encountering an opposing vehicle would increase by:
 - Increase from 2.14% to 2.52% (+0.38%) on Link 1, which represents a change in potential encounters of 1 in 47 trips to 1 in 40 trips. Therefore based on the existing and proposed trips this could result in an additional potential encounter every two hours;
 - Increase from 1.02% to 1.18% (+0.16%) on Link 2, which represents a change in potential encounters of 1 in 98 trips to 85 trips. Therefore based on the existing and proposed trips this could result in 1 additional potential encounter per two hours;

- Increase from 5.93% to 6.95% (+1.02%) on Link 4, which represents a change in potential encounters of 1 in 17 trips to 1 in 14.4 trips. Therefore based on the existing and proposed trips this could result in 1 additional potential encounter per hour; and
- Increase from 4.43% to 5.11% (+0.68%) on Link 5, which represents a change in potential encounters of 1 in 23 trips to 1 in 20 trips. Therefore based on the existing trips this could result in 1 additional potential encounter per 2 hours.

3.11.4 The summary above considers the probability of vehicles encountering an opposing vehicle. It assumes that a vehicle (dominant movement) enters the link once the previous vehicle has exited the link, which represents the maximum time within the network (worst case). Even with this assumption the maximum increase in potential encounters is 1 per hour (link 5). This is considered to be low and even if this occurred there would be a negligible impact on delay as drivers have good visibility between passing opportunities and there isn't current a safety issue.

3.11.5 Notwithstanding the above opportunities to improve these links has been considered

3.12 Proposed Development Lead Mitigation

3.12.1 In the first instance it would be preferable to discourage vehicle trips from the development, in particular single occupied car trips. Alternatives such as walking / cycling and the use of public transport will be promoted through the distribution of travel information packs (TIP). The TIP would also highlight routes from the site which would focus in Mill Lane and The Avenue as the primary route for all trips from the site.

3.12.2 As noted in section 3.8 the proposed development of up to 30 units is estimated to generate approximately 16 two-way vehicle movements in the AM peak and 20 two-way vehicle movements in the PM peak. This equates to 1 vehicle every 4 minutes in the AM peak and 1 vehicle every 3 minutes in the PM peak. Based on vehicle numbers alone it is not considered that the development will have a material impact on the operation of the links reviewed and presented in this Technical Note.

3.12.3 Notwithstanding the above, improvements have been considered that can be delivered by the development. However further to our previous engagement with ECC it is recognized that these need to be balanced so not to encourage more traffic (from within Danbury) to use these routes. Therefore the following improvements are proposed:

- Link 3 Mill Lane (between Millfields and Hyde Lane) – to provide an additional passing area to improve passing opportunities whilst maintaining the rural lane environment to discourage its use. This improvement is presented on drawing ZA931_SK_PL_204.
- Link 5 Hyde Lane (south) – to widen Hyde Lane along the development frontage to 4.1m as presented on drawing ZA931_SK_PL_205. This will formalise the passing area in this location as well as improving road safety at the junction with Mill Lane.

4 Summary and Conclusions

4.1 Summary

4.1.1 This technical note has been prepared to provide a response to comments made by ECC and discussed at the meeting held on the 21st April 2021, which ECC expressed:

- concerns that the existing footway network was not attractive, which may lead to more car trips; and
- concerns that the trips associated with 30 units would result in a severe impact on capacity and safety to the existing lanes (Mill Lane, The Avenue and Hyde Lane). ECC expressed that a reduced development of 6-10 units may be suitable.

4.1.2 In addition the technical note provides additional information regarding:

- provide a review of the existing footway provision;
- provide a review of the existing highway network;
- to assess the traffic impacts of a potential development of 30 new homes;
- to analyse the opportunities for improvement.

4.1.3 A site visit was undertaken to measure and log the existing condition of the footway links along Mill Lane, The Avenue and PROW connecting to Hoynors and the A414. Following this review it is considered that the development could provide uncontrolled crossing points along the route as well as localised resurfacing in the areas identified. In order to quantify the effects of these improvements

4.1.4 CCE have adopted TfL's Healthy Streets Check guidance. Although not adopted by ECC the check provides a score for the existing conditions and then with the potential improvements which allows the benefits over twelve indicators. This assessment shows that the footway proposals will result in an overall benefit for all users.

4.1.5 New ATC traffic surveys to record a snapshot of the current vehicle flows and vehicles speeds on the link. The traffic flows have been reviewed against the previous 2017 data where some changes are noted, which is likely to be the result of effects of the pandemic, which maybe long lasting. However for the purposes of this review the 2017 data has been used as it represents a robust base. The vehicle speed information has been used in the assessment of the links.

4.1.6 The trip associated with the proposed development have been estimated and distributed onto the highway network using the observed traffic movements. This assessment shows that the maximum impact on a link would be 7 vehicles per hour (Mill Lane). The estimated capacity for single lane tracks with passing places has been reviewed and the trips associated with the potential development will not affect capacity.

- 4.1.7 The total capacity of the links has been estimates as 400 vehicle per hour before delay would occur. The expect demand is significantly lower than this and therefore the trips associated with the potential development would not affect driver delay.
- 4.1.8 A site visit was carried out, on the 26th May 2021, to record existing spot widths and passing places/areas on Mill Lane, The Avenue and Hyde Lane. This information has been used to assess the opportunities for vehicles to pass and what improvements could be provided. This review shows that the existing routes have frequent passing opportunities which are spaced with generally good visibility.
- 4.1.9 Using this information the probability of vehicles meeting on a single carriageway has been estimated for the existing base and then assessed with the development trips added. This shows a negligible change and a maximum potential increase in vehicle encounters of 1 per hour. Which even if the additional encounter occurred would not have a material impact on the operation of the links.
- 4.1.10 The Essex Highways online accident records were reviewed which indicate that there has been 1 accident in the most recent 5 year period. This shows that there are no accident patterns or existing safety concerns.

4.2 Conclusions

- 4.2.1 A series of improvements have been proposed which will improve the footway network and encourage walking. In addition it is proposed to provide focused carriageway widening adjacent to the site to improve / formalise the operation of the lanes in these areas.
- 4.2.2 It is therefore considered that the impact resulting from 30 units can be mitigated and based on the review presented in this Technical Note the residual transport impacts resulting from the Mill Lane development are not considered to be 'severe' as prescribed in NPPF

Drawings

NOTES
1) DO NOT SCALE FROM PLAN

PROW / HOYNORS - SEE DRAWING ZA931_PL_SK_204

THE AVENUE - SEE DRAWING ZA931_PL_SK_203

HYDE LANE NORTH - SEE DRAWING ZA931_PL_SK_209

HYDE LANE NORTH - SEE DRAWING ZA931_PL_SK_210

MILL LANE (WEST) - SEE DRAWING ZA931_PL_SK_205

MILL LANE (CENTRAL) - SEE DRAWING ZA931_PL_SK_201 & 202

MILL LANE (EAST) - SEE DRAWING ZA931_PL_SK_206

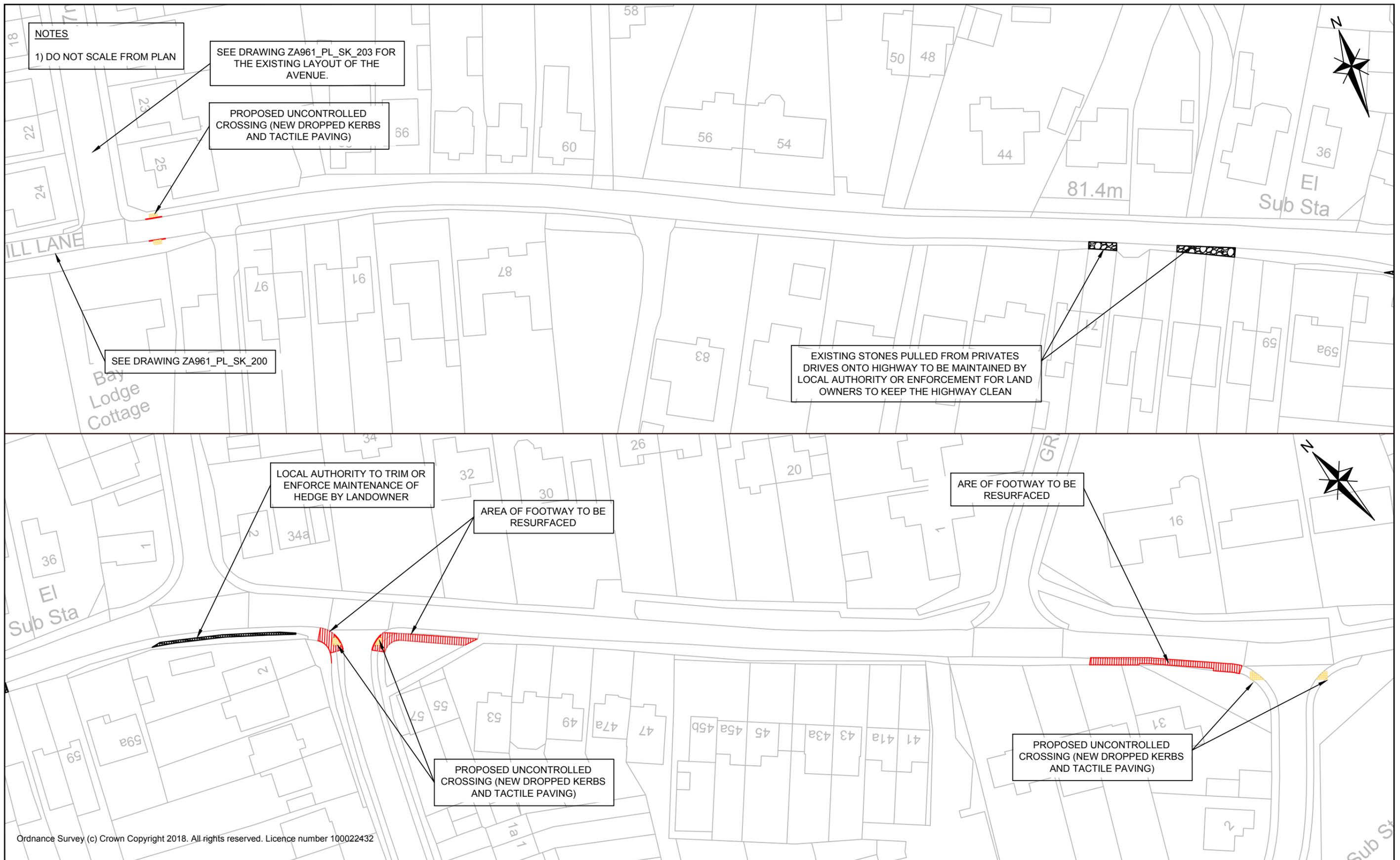
HYDE LANE SOUTH - SEE DRAWING ZA931_PL_SK_207

HYDE LANE SOUTH - SEE DRAWING ZA931_PL_SK_208



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		DRAWING TITLE OVERVIEW PLAN		DESIGNED DS	DRAWN DS	CHECKED DS	PASSED -		SCALE @ A3 NTS	ISSUE STATUS PRELIMINARY	DRAWING NUMBER ZA931 PL SK 200
REV	DESCRIPTION	CH	PA	DATE	NOTE THE PROPERTY OF THIS DRAWING AND DESIGN IS VESTED IN CANNON CONSULTING ENGINEERS AND MUST NOT BE COPIED OR REPRODUCED IN ANY WAY WITHOUT THEIR WRITTEN CONSENT						



NOTES
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SEE DRAWING ZA961_PL_SK_203 FOR THE EXISTING LAYOUT OF THE AVENUE.

PROPOSED UNCONTROLLED CROSSING (NEW DROPPED KERBS AND TACTILE PAVING)

SEE DRAWING ZA961_PL_SK_200

EXISTING STONES PULLED FROM PRIVATES DRIVES ONTO HIGHWAY TO BE MAINTAINED BY LOCAL AUTHORITY OR ENFORCEMENT FOR LAND OWNERS TO KEEP THE HIGHWAY CLEAN

LOCAL AUTHORITY TO TRIM OR ENFORCE MAINTENANCE OF HEDGE BY LANDOWNER

AREA OF FOOTWAY TO BE RESURFACED

ARE OF FOOTWAY TO BE RESURFACED

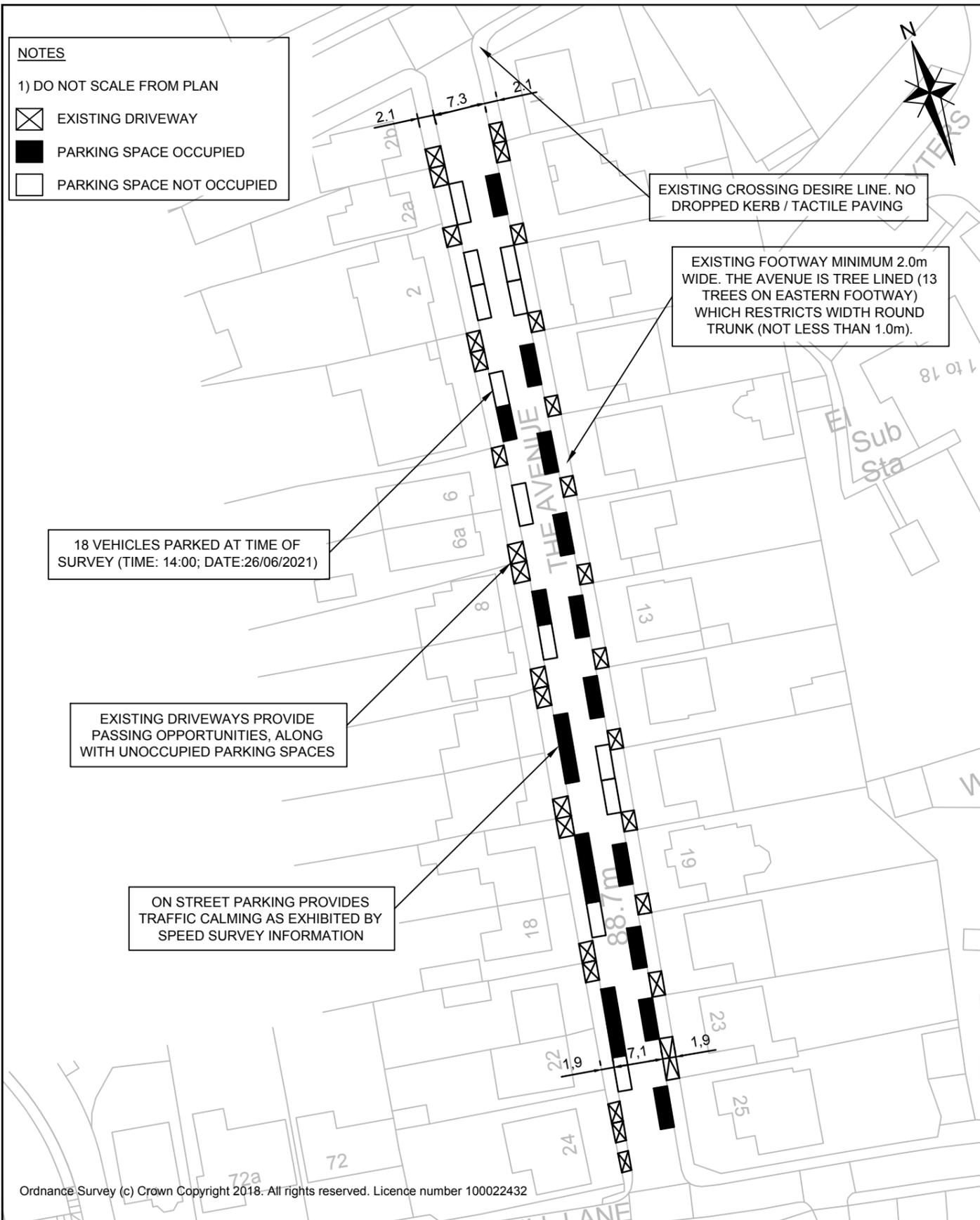
PROPOSED UNCONTROLLED CROSSING (NEW DROPPED KERBS AND TACTILE PAVING)

PROPOSED UNCONTROLLED CROSSING (NEW DROPPED KERBS AND TACTILE PAVING)

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DRAWING TITLE MILL LANE - PROPOSED FOOTWAY IMPROVEMENTS		DESIGNED DS	DRAWN DS	CHECKED DS	PASSED -		SCALE @ A3 NTS	ISSUE STATUS PRELIMINARY	DRAWING NUMBER ZA931 PL SK 202
REV	DESCRIPTION	CH	PA	DATE	NOTE THE PROPERTY OF THIS DRAWING AND DESIGN IS VESTED IN CANNON CONSULTING ENGINEERS AND MUST NOT BE COPIED OR REPRODUCED IN ANY WAY WITHOUT THEIR WRITTEN CONSENT				

- NOTES**
- 1) DO NOT SCALE FROM PLAN
 - ☒ EXISTING DRIVEWAY
 - PARKING SPACE OCCUPIED
 - PARKING SPACE NOT OCCUPIED



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	DRAWING TITLE THE AVENUE - EXISTING AND PROPOSED	DESIGNED DS	DRAWN DS		CHECKED DS	PASSED -	SCALE @ A3 NTS	ISSUE STATUS PRELIMINARY	DRAWING NUMBER ZA931 PL SK 203
REV	DESCRIPTION	CH	PA	DATE					

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NOTES
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EXISTING FOOTWAY MINIMUM 2.0m WIDE. THE AVENUE IS TREE LINED (13 TREES ON EASTERN FOOTWAY) WHICH RESTRICTS WIDTH ROUND TRUNK (NOT LESS THAN 1.0m).

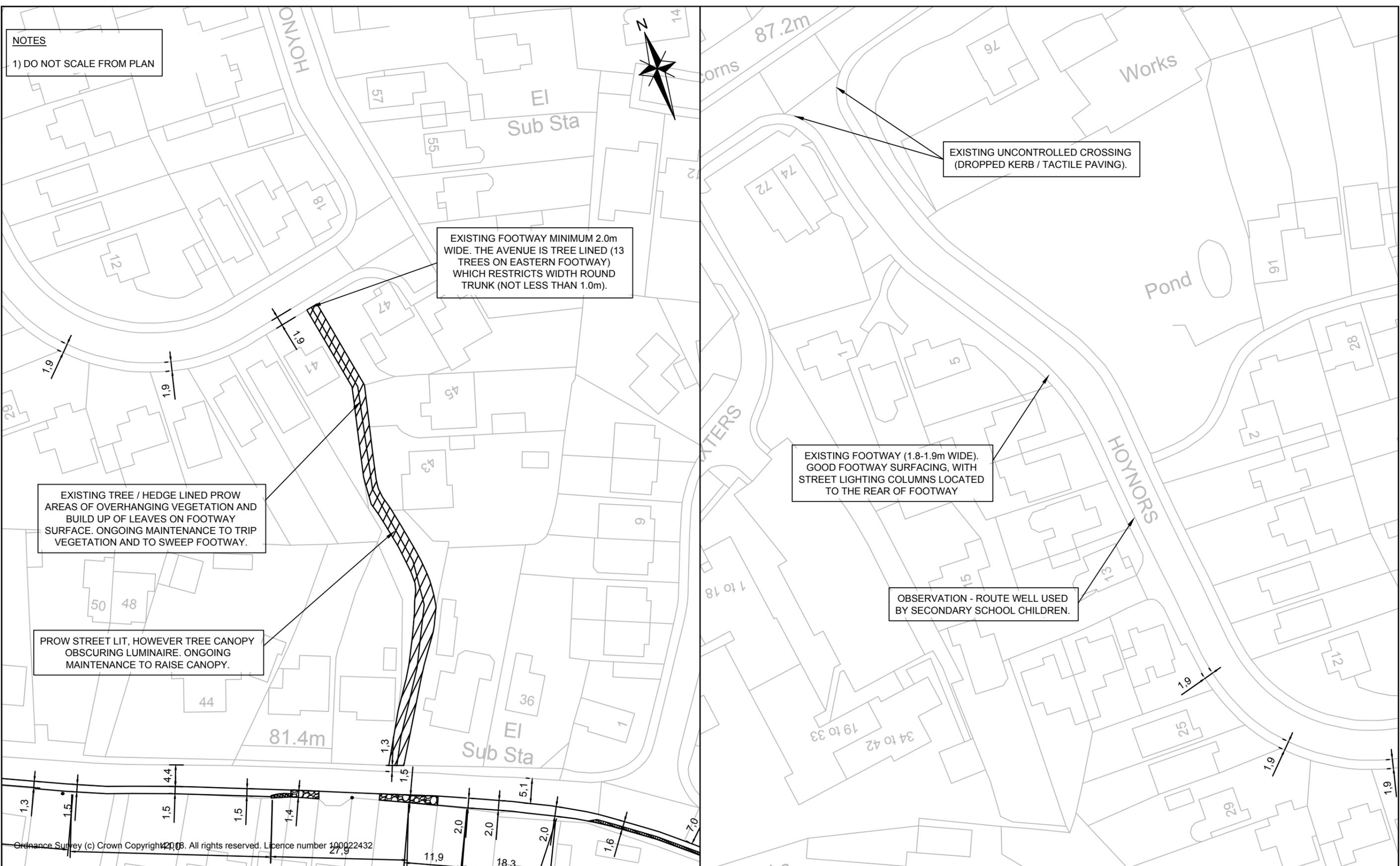
EXISTING UNCONTROLLED CROSSING (DROPPED KERB / TACTILE PAVING).

EXISTING TREE / HEDGE LINED PROW AREAS OF OVERHANGING VEGETATION AND BUILD UP OF LEAVES ON FOOTWAY SURFACE. ONGOING MAINTENANCE TO TRIP VEGETATION AND TO SWEEP FOOTWAY.

EXISTING FOOTWAY (1.8-1.9m WIDE). GOOD FOOTWAY SURFACING, WITH STREET LIGHTING COLUMNS LOCATED TO THE REAR OF FOOTWAY

PROW STREET LIT, HOWEVER TREE CANOPY OBSCURING LUMINAIRE. ONGOING MAINTENANCE TO RAISE CANOPY.

OBSERVATION - ROUTE WELL USED BY SECONDARY SCHOOL CHILDREN.

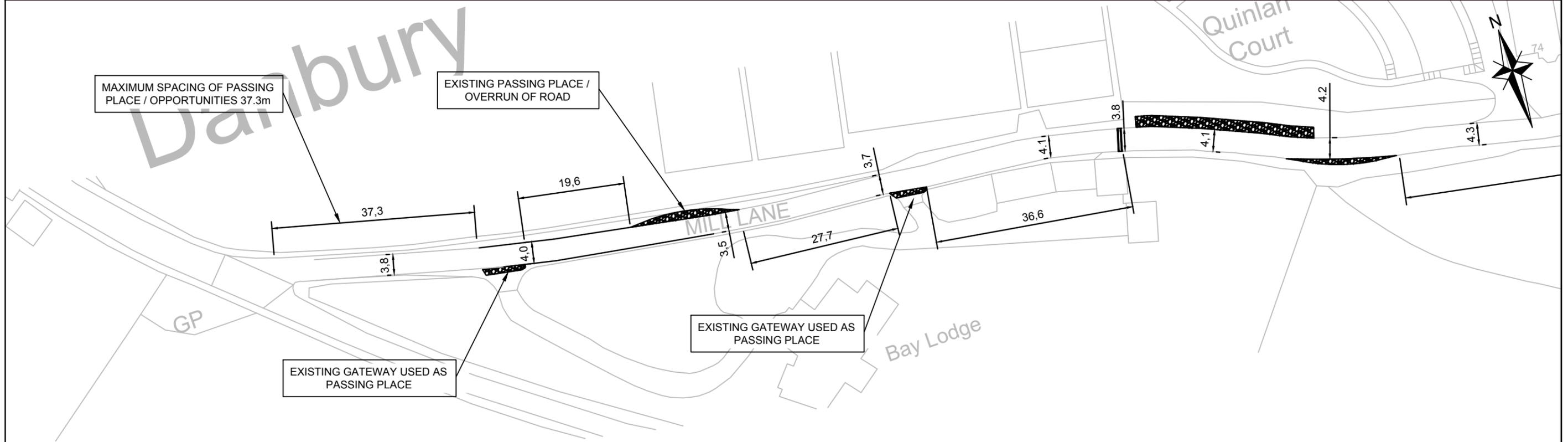
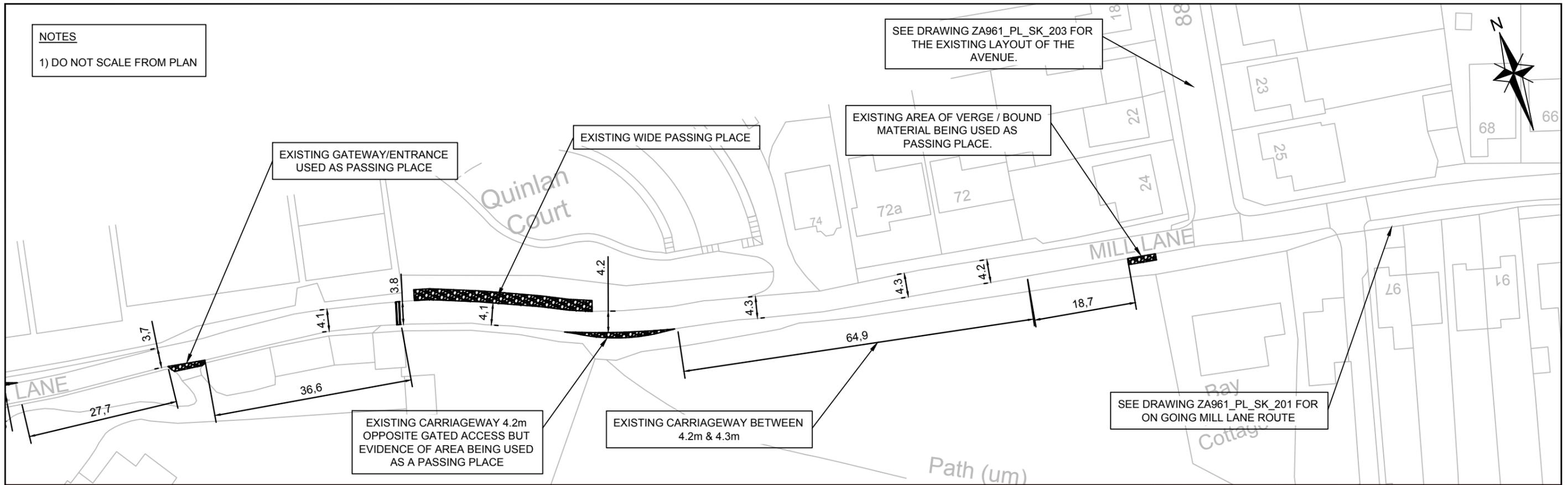


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DRAWING TITLE EXISTING PEDESTRIAN ROUTE PROW & HOYNORS		DESIGNED DS	DRAWN DS	CHECKED DS	PASSED -		SCALE @ A3 NTS	ISSUE STATUS PRELIMINARY	DRAWING NUMBER ZA931 PL SK 204
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NOTES

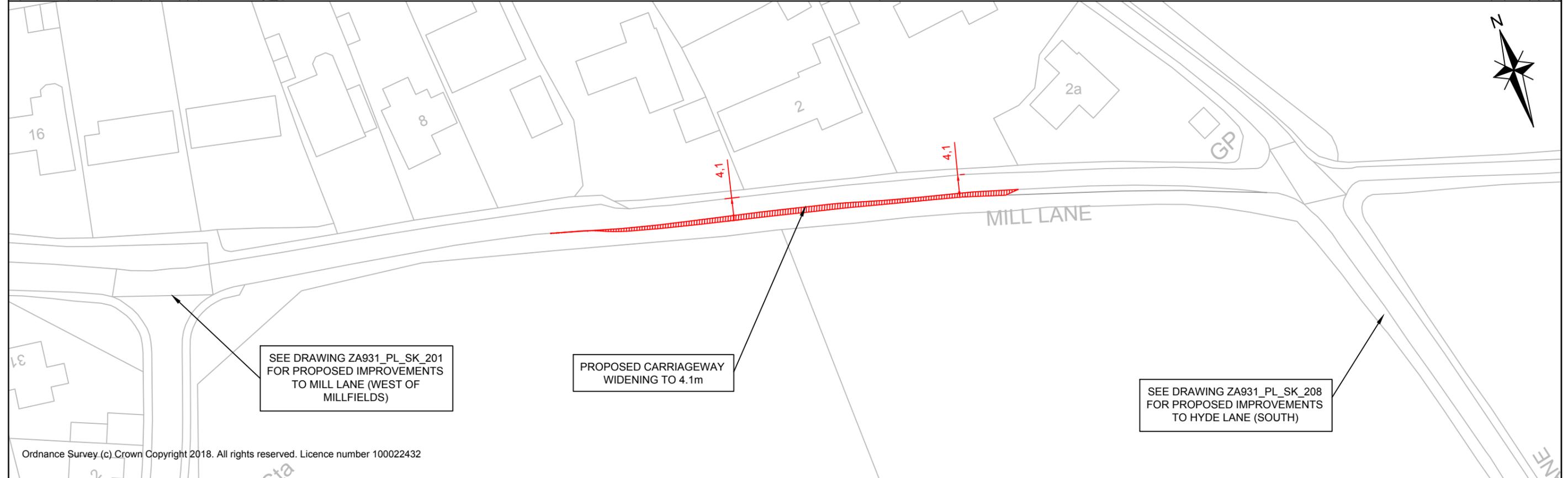
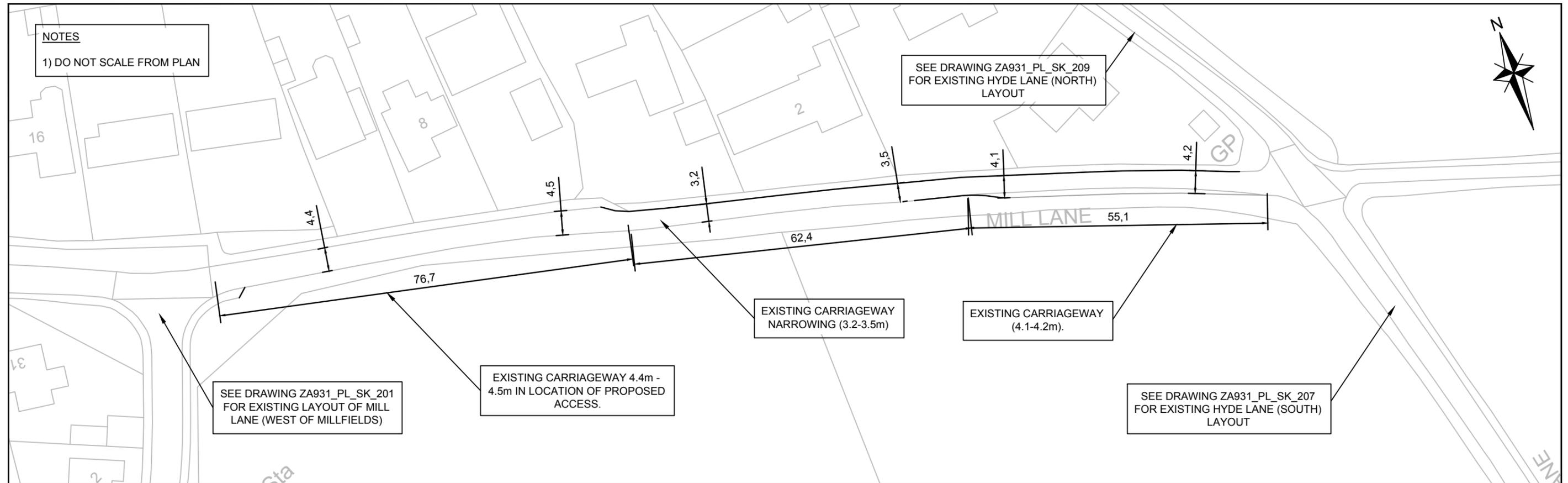
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DRAWING TITLE MILL LANE (WEST OF THE AVENUE) LAYOUT PLAN		DESIGNED DS	DRAWN DS	CHECKED DS	PASSED -		SCALE @ A3 NTS	ISSUE STATUS PRELIMINARY	DRAWING NUMBER ZA931 PL SK 205
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DRAWING TITLE MILL LANE (EAST OF MILLFIELDS) CARRIAGEWAY LAYOUT		DESIGNED DS	DRAWN DS	CHECKED DS	PASSED -		SCALE @ A3 NTS	ISSUE STATUS PRELIMINARY	DRAWING NUMBER ZA931 PL SK 206
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NOTES
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EXISTING PASSING PLACE ALLOWING TWO VEHICLES TO PASS

PROPOSED CARRIAGEWAY WIDENING ON DEVELOPMENT SIDE TO 4.1m

EXISTING SINGLE LANE SECTION

EXISTING PASSING PLACE ALLOWING TWO VEHICLES TO PASS

EXISTING PASSING PLACE

EXISTING JUNCTIONS USED AS PASSING PLACES

SEE DRAWING ZA931_PL_SK_208 FOR HYDE LANE CONTINUATION

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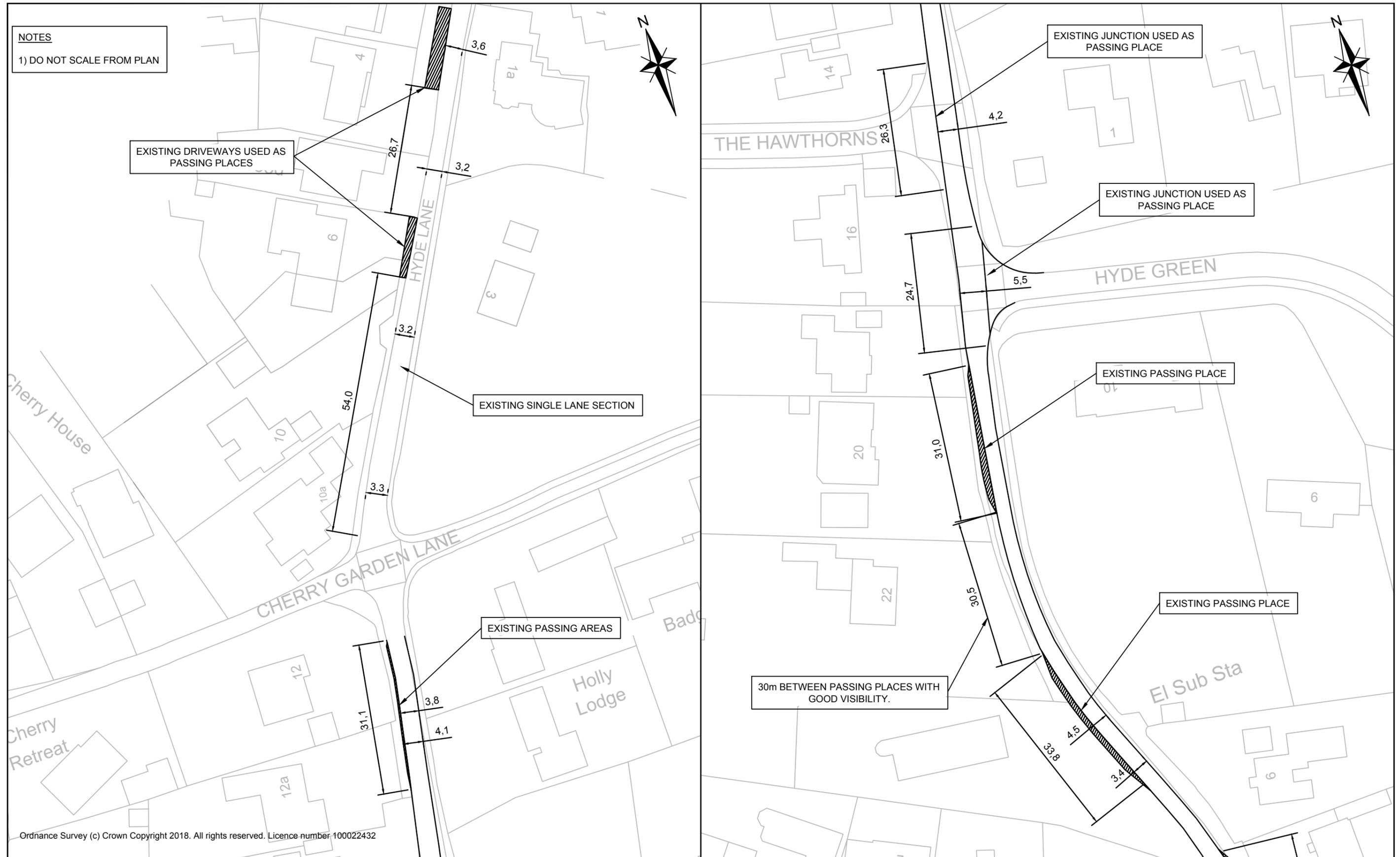
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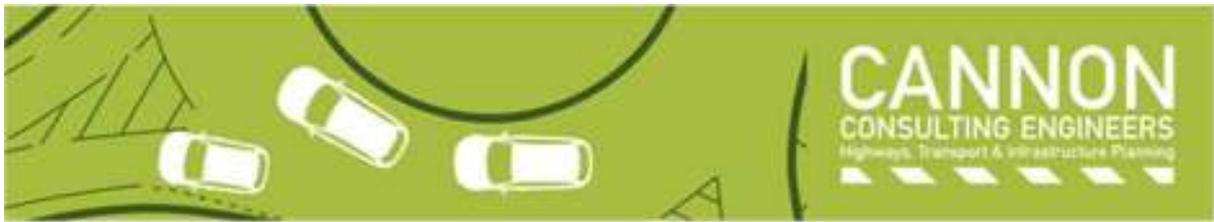


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Appendix A

Technical Note 1



ZA931 – Land to the South of Mill Lane, Danbury
Technical Note 1 – Local Highway Network Review
For Stonebond Properties Ltd
January 2021

1 Introduction

- 1.1 Cannon Consulting Engineers is appointed to provide highways and transportation advice to Stonebond Properties Ltd, in support of the promotion a parcel of land located to the south of Mill Lane, Danbury, which is currently being considered by the Danbury Neighbourhood Plan working group under reference D9. The location of the site is shown below:



Image 1.1 – Site Location Plan (mapping source www.google.com/maps accessed 28/01/21)

- 1.2 The Danbury Neighbourhood Plan (DNP) is being created to help shape how development in the Parish of Danbury is brought forward. Danbury has been identified for housing growth of around 100 units. As part of this process developers and land owners were invited to submit development proposals on potential sites with a preference of sites with no more than 30 units. Details of a proposed development of up to 30 units was submitted on Land south of Mill Lane.

- 1.3 Having submitted details for the site the DNP's Working Group have reviewed site D9 and discussed the proposals with Essex County Council as the Local Highway Authority. In their response dated the 24th December 2020 they include comments received from Essex Highways which states:

D9 – (RAG red) The Highway Authority would not support an application for dwellings with access from Mill Lane or Millfields. The capacity of the wider local highway network (Hyde Lane, Mill Lane, The Avenue) would indicate that this site is not suitable.

- 1.4 This Technical Note has been prepared to provide a review of the links referred to in Essex Highways response. This includes a review of the existing network and estimates the impact resulting from the development.
- 1.5 Essex Highways were contacted to discuss comments raised, the potential impact from the development and improvements which could be made to mitigate any impact. These discussions are ongoing.
- 1.6 Site visits have been undertaken to review the existing highway network and operation in the vicinity of the site. In order to provide for a robust assessment of local highway capacity, this report considers the current position with regard to road characteristics and classifications, existing vehicular trips on the network and the historic safety record of the local network. The report then examines the impact associated with a development of up to 30 new properties on site D9.

2 Existing Highway Network

- 2.1 The site is located to the south-east of Danbury and is bound by Mill Lane (to the north), Hyde Lane (to the east), Millfields (to the west) and woodland / a private dwelling to the south.
- 2.2 Mill Lanes runs in an approximate east-west direction from its junction with Hyde Lane (to the east) and The Avenue and Gay Bowers Lane (to the west). Mill Lane varies in width from approximately 4.8m and 5.5m between the proposed site access and The Avenue. Along this section there is a continuous footway on the southern side of the road and partial footway along the northern side of the road.
- 2.3 From its junction with The Avenue Mill Lane narrows, to a single carriageway, until its junction with Gay Bowers Lane, which connects to the A414 (a distance of approximately 300m. Along this section there are a number of passing places, which include both formal and informal (driveways). The alignment of Mill Lane provides good visibility and the frequency of spaces provide a number of opportunities for vehicles to pass.
- 2.4 Hyde Lane forms a junction with Mill Lane to the north-east of the site. From this point Hyde Lane runs north forming a priority T-junction with the A414 and to the south forms a priority T-junction with the B1418. Hyde Lane varies in width, where the majority of the route is a single lane with passing opportunities (informal and formal). Hyde Lane widens in places where two cars are able to pass and operates with a 7.5t restriction.
- 2.5 The Avenue is a relatively wide road with footways located on both sides of the carriageway. On road parking occurs on both sides of the carriageway which narrows the effective width. However there are a number of driveways which create gaps in the parking allowing vehicles to pass each other. The Avenue is on a straight alignment providing good visibility along its length.
- 2.6 The A414 is a local distributor providing a strategic connection to the A12 and Chelmsford to the west and Maldon to the east. It is expected that the majority of trips from the development would distribute out to the A414 and to the west.
- 2.7 The review of the vehicular access shows that there is an attractive route from the site to the A414 via Mill Lane and the Avenue which is considered to be of a good standard. Although it is acknowledged that some trips may use Mill Lane (west) and Hyde Lane depending on their final destination.

Walking

- 2.8 As noted above there is a continuous footway connection between the edge of the site and the A414 (via Mill Lane and The Avenue) which provides access to the existing public transport interchange, local shop, leisure and primary school. The walking distances to key facilities are summarised below:
- Tesco Express – 640m or 9min walk;
 - Existing Bus Stops – 800m or 10min walk

- Primary School – 1200m or 17min walk
 - Leisure / Gym – 1400m or 19min walk.
- 2.9 The route via Mill Lane and The Avenue is fronted by residential properties providing good levels of natural surveillance making it an attractive route. In addition to this route there is a public right of way which runs between Mill Lane and Hoynors / A414 and also Danbury Vale and Landisdale / A414. These routes will provide access as a leisure route.
- 2.10 As noted above the nearest bus stops are located on the A414 to the north-west of the site. This stop is served by route 31 which provides a 30 minute frequency to Chelmsford City Centre and Maldon and Burnham. The service is consistent through the day started at 0600 AM and until 23:35 in the evening. Providing an attractive alternative to single occupancy car use.
- 2.11 The route from the site to the A414 has been reviewed and a number of improvement are being considered and discussed with Essex County Council Highways. These include providing dropped kerbs and tactile paving at the following junctions:
- Millfields at the junction with Mill Lane;
 - Pedlars Path at the junction with Mill Lane; and
 - Mill Lane at the junction The Avenue
 - The Avenue at the junction with Mill Lane.
- 2.12 It is considered that the site is well located and that walking can provide a realistic alternative to single occupancy car trips particularly for short trips to the local facilities and as part of a sustainable trip using the public transport network to access Chelmsford City Centre and Maldon and Burnham.

Rural Roads / Protected Lanes

- 2.13 The adopted Chelmsford Local Plan seeks to protect non designated heritage assets as set out in Policy DM14. Paragraph 8.92 of the Local Plan states:
- The focus of the policy is based on the protection and retention of non-designated heritage assets as identified on the Council's Buildings of Local Value List, Inventory of Landscaping of Local Interest and Protected Lanes Studies.*
- 2.14 Essex County Council's Place Services Historic Environment Team was commissioned by Chelmsford City Council to undertake an assessment of six lanes within Danbury in 2017. Hyde Lane was identified as one of the lanes reviewed however following the initial review did not score high enough and as a result was not taken forward to the second stage of the assessment.

2.15 As a result, none of the links identified in the Essex Highways response were recommended to become a protected lane.

Existing Traffic Flows

2.16 Traffic surveys of the road network were carried out in October 2017. This data has been reviewed to calculate the link flows on Mill Lane, The Avenue and Hyde Lane, which are summarised on Figure 2.1 and 2.2 below.

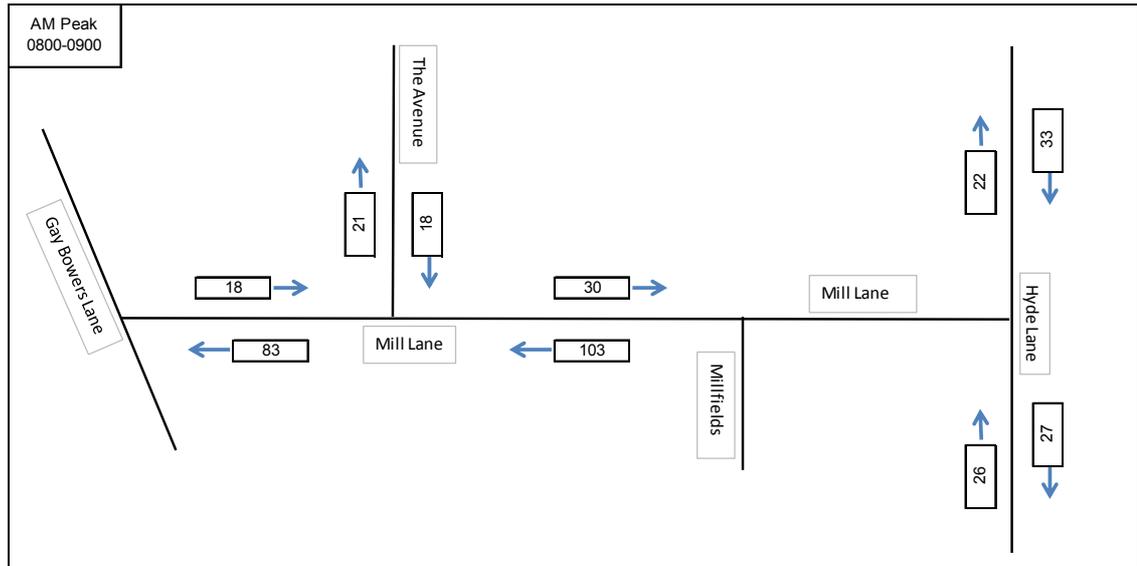


Figure 2.1 – 2017 Observed Traffic Counts AM peak

2.17 The traffic link flows summarised above have been used to calculate the two way link flows in the AM peak hour (0800-0900), which are summarised below:

- Mill Lane (west) – 103 vehicles, frequency 1 vehicle every 35 seconds;
- The Avenue – 39 vehicles, frequency 1 vehicle every 92 seconds;
- Hyde Lane (north) - 55 vehicles, frequency 1 vehicle every 65 seconds; and
- Hyde Lane (south) – 53 vehicles, frequency 1 vehicle every 68 seconds.

2.18 The data for the AM peak shows that the adjoining road network is lightly trafficked with average frequencies of 1 vehicle every 35 – 92 seconds.

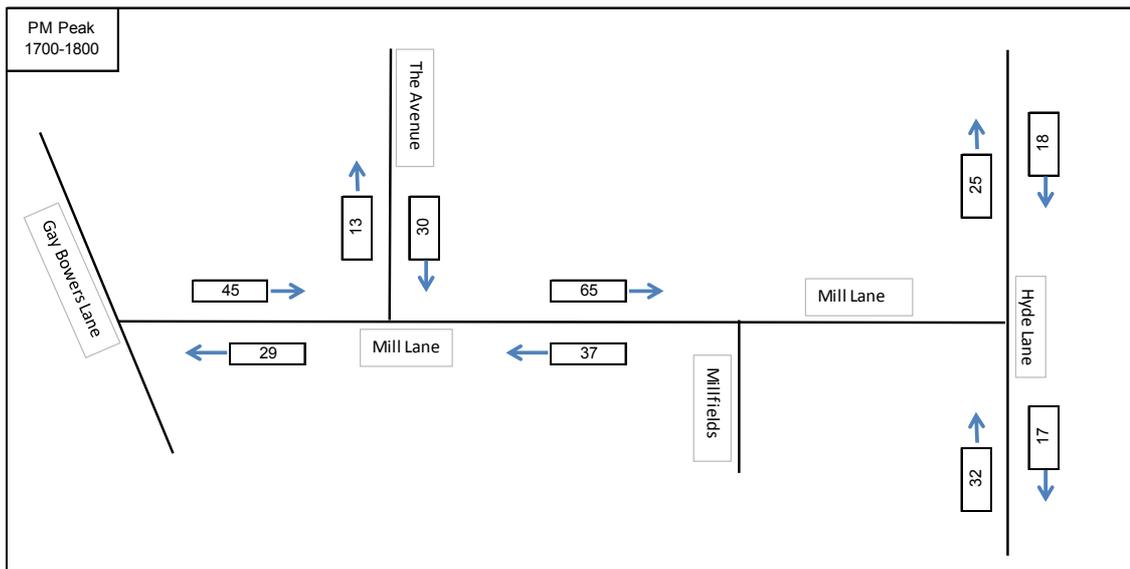


Figure 2.2 – 2017 Observed Traffic Counts PM peak

2.19 The traffic link flows summarised above have been used to calculate the two way link flows in the PM 1700-1800) which are summarised below:

- Mill Lane (west) – 74 vehicles, frequency 1 vehicle every 48 seconds;
- The Avenue – 43 vehicles, frequency 1 vehicle every 83 seconds;
- Hyde Lane (north) - 43 vehicles, frequency 1 vehicle every 83 seconds; and
- Hyde Lane (south) – 49 vehicles, frequency 1 vehicle every 73 seconds.

2.20 The data for the PM peak shows that the adjoining road network is lightly trafficked with average frequencies of 1 vehicle every 48 – 83 seconds.

Personal Injury Accident (PIA) Review

- 2.21 The Safer Essex Roads Partnership (SERP) has developed the saferessexroads.org website in partnership with Essex County Council, Southend-On-Sea Borough Council and Thurrock Council. Other partners include Essex Police, Essex County Fire and Rescue Service (ECRFS), Highways England and Essex & Herts Air Ambulance. The website provides an overview of the accident location for the most recent 5 year period (01/01/2015 – 31/12/2019). This information has been reviewed to determine whether there have been any accidents on the adjacent links considered in this note. An extract from the website is shown below:



Image 2.1 – 5yr Accident Data Extract (source saferessexroads.org accessed 28/01/21)

- 2.22 The online mapping shows that there have been no accidents recorded on Mill Lane, The Avenue or the southern section of Hyde Lane. The data records 1 accident on the northern section of Hyde Lane which involved 2 vehicles and occurred at the junction with Dilston suggesting it was associated with a turning movement. The accident occurred on the 8th September 2019 and was slight in severity.
- 2.23 The review of the accident data suggests that there are no existing road safety concerns associated with Mill Lane, Hyde Lane or the Avenue.

Proposed Development

- 2.24 The site is being promoted for a residential development of up to 30 units which is in line with the expectations of the DNP. It is proposed to access the site from Mill Lane in the north-west corner, where a new priority controlled T-junction will be created. The location of the junction provides good visibility along Mill Lane in accordance with the Essex County Council Design Technical guidance. The access road into the development will be to Essex County Councils Type E road specification which is suitable for the scale of development. Footways will be provided, which will tie in with the existing provision to the west of the site.

- 2.25 An ATC survey of Barley Mead was carried out in October 2017 to observe all vehicle movements in and out of the existing development. Barley Mead comprises 38 residential properties which is slightly larger, but comparable to the development proposals being considered at Land to the South of Mill Lane.
- 2.26 The observed traffic movements have been used to estimate a local trip rate, which has been compared to trips derived from TRICs. These are summarised below:

	Local Trip Rate		TRICs Trip Rate		Difference	
	Arrive	Depart	Arrive	Depart	Arrive	Depart
AM Peak	0.083	0.338	0.114	0.426	-0.061	-0.088
PM Peak	0.459	0.218	0.403	0.263	+0.056	-0.045

Table 2.1 – Trip Rate Summary

- 2.27 The summary above shows that the local trip rates are lower in the AM peak and marginally higher in the PM peak. Although it is considered reasonable to use the locally derived trip rates the TRICs trip rates have been used to form a robust appraisal of the likely impacts resulting from the development.
- 2.28 The trip attraction of the site has been estimated using the TRICs derived trip rates for a development of up to 30 units, as summarised below.

	AM Peak			PM Peak		
	Arrive	Depart	Two way	Arrive	Depart	Two way
AM	3	13	16	12	8	20

Table 2.2 – Development Trips (30 Units)

- 2.29 The table above shows the development is likely to generate 16 two way trips in the AM peak and 20 two way trips in the PM peak.
- 2.30 The vehicle trips have been distributed onto Mill Lane, The Avenue and Hyde Lane using the link flows shown in figure 2.1 and 2.2, which are summarised below:

	AM Peak			PM Peak		
	Existing Frequency (sec)	Proposed Frequency (sec)	Change	Existing Frequency (sec)	Proposed Frequency (sec)	Change
Mill Lane (W)	103	7	110	73	6	79
The Avenue	39	3	42	43	4	47
Hyde Lane (N)	56	4	60	43	4	47
Hyde Lane (S)	53	4	57	49	4	53

Table 2.3 – Development Distribution and Combined Link Flow Summary

- 2.31 The summary above estimates that the maximum impact of the development would be an additional 7 vehicles on Mill Lane (w).
- 2.32 The existing frequency of vehicles on this link is 1 vehicle every 35 seconds. When the development traffic is included the frequency of vehicles changes to 33 seconds. An increase in frequency of 2 seconds. The increase in frequency is not considered to be significant and will not have a material impact on the operation of the adjoining road network.
- 2.33 A summary of the change in frequency on all links is summarised below:

	AM Peak			PM Peak		
	Existing Two Way (secs)	Proposed Dev (secs)	Combined (sec)	Existing Two Way (secs)	Proposed Dev (sec)	Combined (sec)
Mill Lane (W)	35	33	-2	48	46	-2
The Avenue	92	86	-6	83	76	-7
Hyde Lane (N)	65	60	-5	83	76	-7
Hyde Lane (S)	68	63	-5	73	68	-5

Table 2.3 – Existing and Proposed Frequency of Vehicle Link Summary

- 2.34 The table above shows that the frequency of vehicles on each link would increase from 35 to 92 seconds to 33 and 86 seconds. It is considered that this change would have a negligible impact on the operation of the links.
- 2.35 Although it is considered that the impact from the development will not have a material impact on the operation of the road network. Opportunities to improve the existing passing bays and to improve pedestrian crossing facilities are being considered and discussed with

Essex County Council Highways. These measures are being considered as an improvement to the highway network as well as encouraging walking for short and linked (public transport trips) to reduce the number of trip undertaken by car. The development would provide travel information packs to future residents to promote the benefits of walking / cycling and using sustainable travel modes.

3 Summary and Conclusions

- 3.1 This technical note has been prepared to provide a review of the capacity of the existing road network and likely impact resulting from the development proposals.
- 3.2 The review of the existing highway showed that the existing roads are lightly trafficked with a two way frequency of 1 vehicle every 35 - 92 seconds.
- 3.3 The Essex Highways online accident records were reviewed which indicate that there has been 1 accident in the most recent 5 year period. This shows that there are no accident patterns or existing safety concerns.
- 3.4 The trip associated with the proposed development have been estimated and distributed onto the highway network using the observed traffic movements. This assessment shows that the maximum impact on a link would be 7 vehicles per hour (Mill Lane) which will not have a material impact of the operation of the existing road network.
- 3.5 As a result it is not considered that the proposed development would result in a significant impact on the highway network or the existing road safety. We are continuing to engage with Essex County Council Highways to understand issues in the surround areas to inform and focus any mitigation which is required as a result of the development impacts.

Appendix B

Healthy Street Check – Metric / Indicator Matrices

Healthy Street Indicators

How each metric contributes to the Healthy Streets Indicators' scores										
	Pedestrians from all walks of life	Easy to cross	Shade and shelter	Places to stop and rest	Not too noisy	People choose to walk, cycle and use PF	People feel safe	Things to see and do	People feel relaxed	Clean air
1. Total volume of two way motorised traffic	✓	✓	-	-	-	✓	✓	-	✓	-
2. Interaction between large vehicles and people cycling	✓	-	-	-	-	✓	✓	-	✓	-
3. Speed of motorised traffic	✓	✓	-	-	-	✓	✓	-	✓	-
4. Traffic noise based on peak hour motorised traffic volumes	✓	-	-	-	✓	✓	-	-	✓	-
5. Noise from large vehicles	✓	-	-	-	✓	✓	-	-	✓	-
6. NO2 concentration (from London Atmospheric Emission Inventory)	✓	-	-	-	-	✓	-	-	-	✓
7. Reducing private car use	✓	✓	-	-	✓	✓	✓	-	✓	✓
8. Ease of crossing side roads for people walking	✓	✓	-	-	-	✓	✓	-	✓	-
9. Controlled crossings to meet pedestrian desire lines	✓	✓	-	-	-	✓	✓	-	✓	-
10. Type and suitability of pedestrian crossings away from junctions	✓	✓	-	-	-	✓	✓	-	✓	-
11. Additional features to support people using controlled crossings	✓	✓	-	-	-	✓	✓	-	✓	-
12. Width of clear continuous walking space	✓	-	-	✓	-	✓	✓	-	✓	-
13. Sharing of footway with people cycling	✓	✓	-	-	-	✓	✓	-	✓	-
14. Collision risk between people cycling and turning motor vehicles	✓	-	-	-	-	✓	✓	-	✓	-
15. Effective width for cycling	✓	-	-	-	-	✓	✓	-	✓	-
16. Impact of kerbside activity on cycling	✓	-	-	-	-	✓	✓	-	✓	-
17. Quality of carriageway surface	✓	-	-	-	-	✓	✓	-	✓	-
18. Quality of footway surface	✓	✓	-	-	-	✓	✓	-	✓	-
19. Surveillance of public spaces	✓	-	-	✓	-	✓	✓	-	✓	-
20. Provision of cycle parking	✓	-	-	-	-	✓	✓	-	✓	-
21. Street trees	✓	-	✓	✓	✓	✓	✓	✓	✓	✓
22. Planting at footway-level (excluding trees)	✓	-	-	✓	✓	✓	✓	✓	✓	✓
23. Walking distance between resting points (benches and other informal seating)	✓	-	-	✓	-	✓	-	✓	✓	-
24. Walking distance between sheltered areas protecting from rain. Including fixed awning or other shelter provided by buildings/ infrastructure	✓	-	✓	-	-	✓	-	✓	✓	-
25. Factors influencing bus passenger journey time	✓	-	-	-	-	✓	-	-	✓	-
26. Bus stop accessibility	✓	-	-	-	-	✓	✓	-	✓	-
27. Bus lane operation	✓	-	-	-	-	✓	-	-	✓	-
28. Impact of kerbside activity on bus operations	✓	-	-	-	-	✓	✓	-	✓	-
29. Bus stop connectivity with other public transport services	✓	-	-	-	-	✓	-	✓	✓	-
30. Step-free access from the street to the station entrance	✓	-	-	-	-	✓	-	✓	✓	-
31. Support for interchange between cycling and underground/rail	✓	-	-	-	-	✓	-	-	✓	-

Appendix C

Richard Sweet (Somerset County Council) – Single Lane Capacity Presentation

The capacity of single-track rural lanes: an initial investigation

Richard Sweet

**Senior Traffic Modeller,
Somerset County Council**

**TRICS Transport &
Development Conference**

13 Nov 2012



The capacity of single-track lanes

- 1) Introduction
- 2) Objectives of the research
- 3) The literature
- 4) Methodology
- 5) Results and Discussion
- 6) Conclusion
- 7) What next?



Argument by anecdote...

The TA:

“I have seen no record that this [existing] use has caused serious traffic congestion”; and

“Where congestion does not occur, it is acknowledged that up to 10% additional traffic will not make significant impact”; so

“It is clear that the proposal should be considered acceptable”

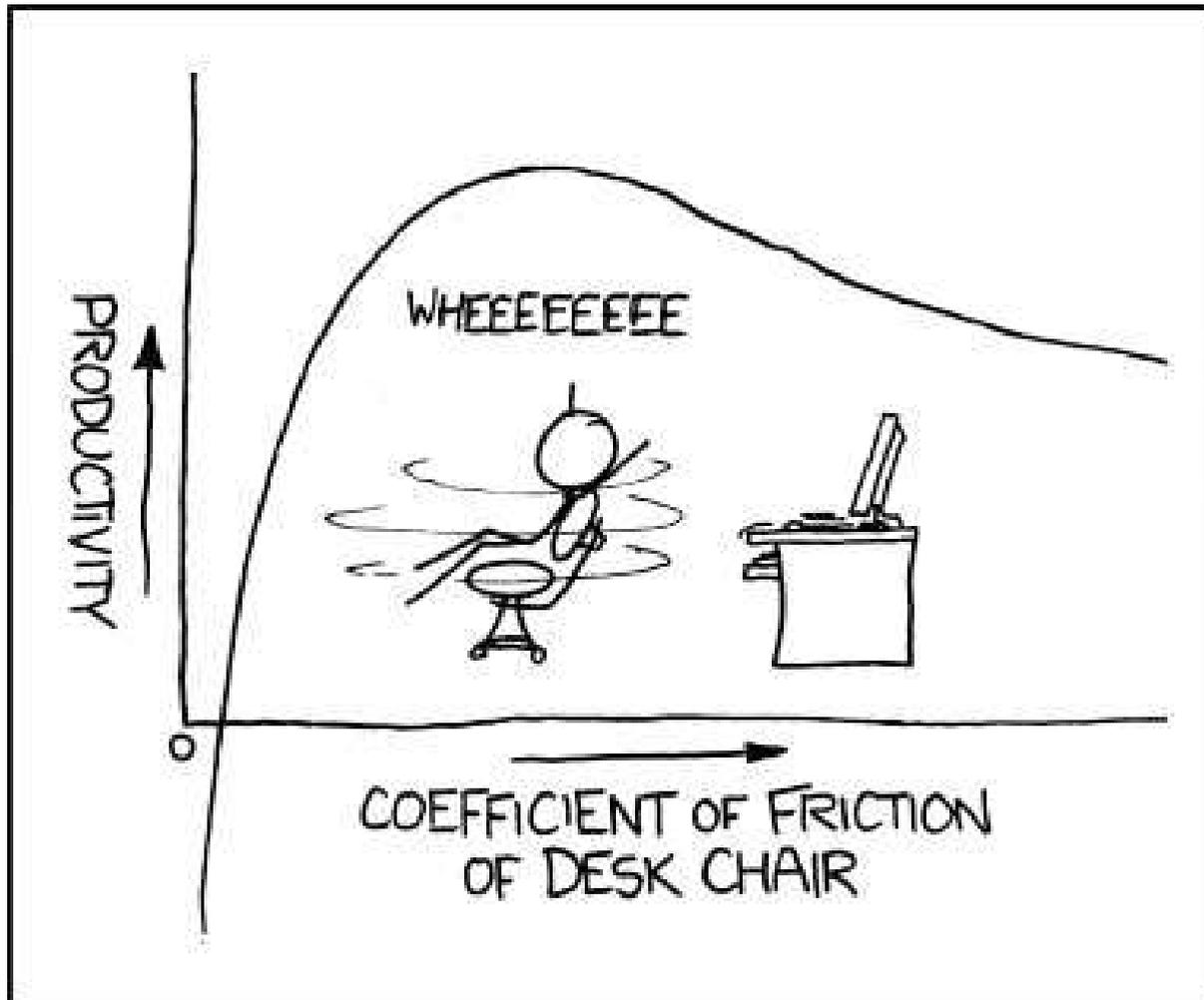
The residents:

“The new facility has generated a significant increase in traffic”

“The volume and size of lorries has increased... this beautiful countryside should not be marred with so many vehicles”

“The lorry traffic on [this road] is... constant”

...makes for confused officers



The capacity of single-track lanes

- 1) Introduction
- 2) **Objectives of the research**
- 3) The literature
- 4) Methodology
- 5) Results and Discussion
- 6) Conclusion
- 7) What next?



What I wanted to do

1. Determine whether S-Paramics can produce results correlating with those found in previous research
2. Determine at what level of flow the S-Paramics model suggests an effective capacity is reached
3. Determine whether tidal flow has a significant impact on the capacity of a single track road

The capacity of single-track lanes

- 1) Introduction
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Walker et al. (1967)

*LR71 Single Track Roads in the Scottish Highlands
(Further Traffic Studies 1964)*

- Four stretches of Scottish lane (reg surveys)
- Found capacities 100 – 220 veh/hr
- Found linear relationship...

Walker et al. (1967) (cont'd)

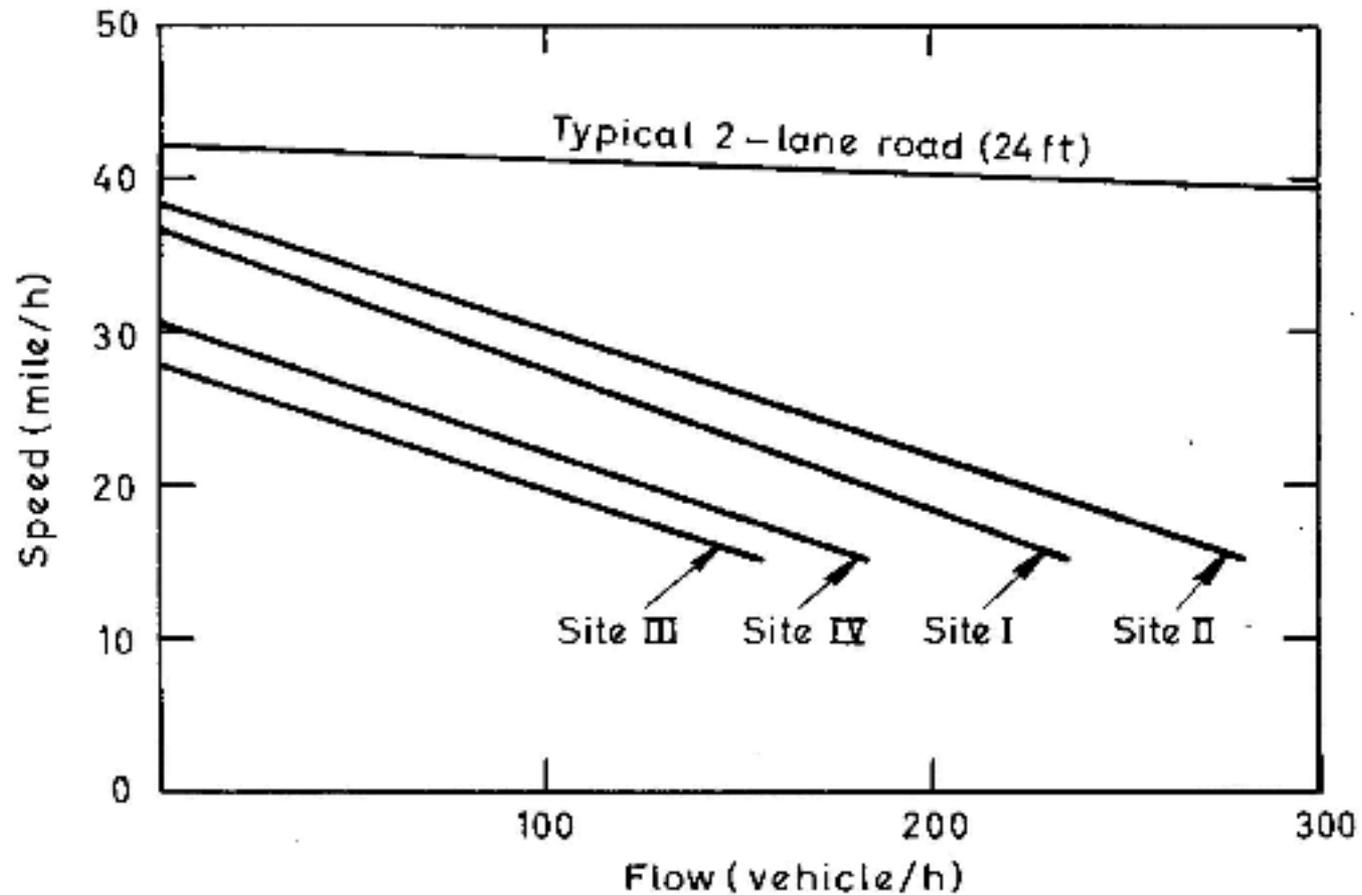


Fig. 6. COMPARISON OF SPEED-FLOW RELATIONSHIPS

Walker et al. (1967) (cont'd)

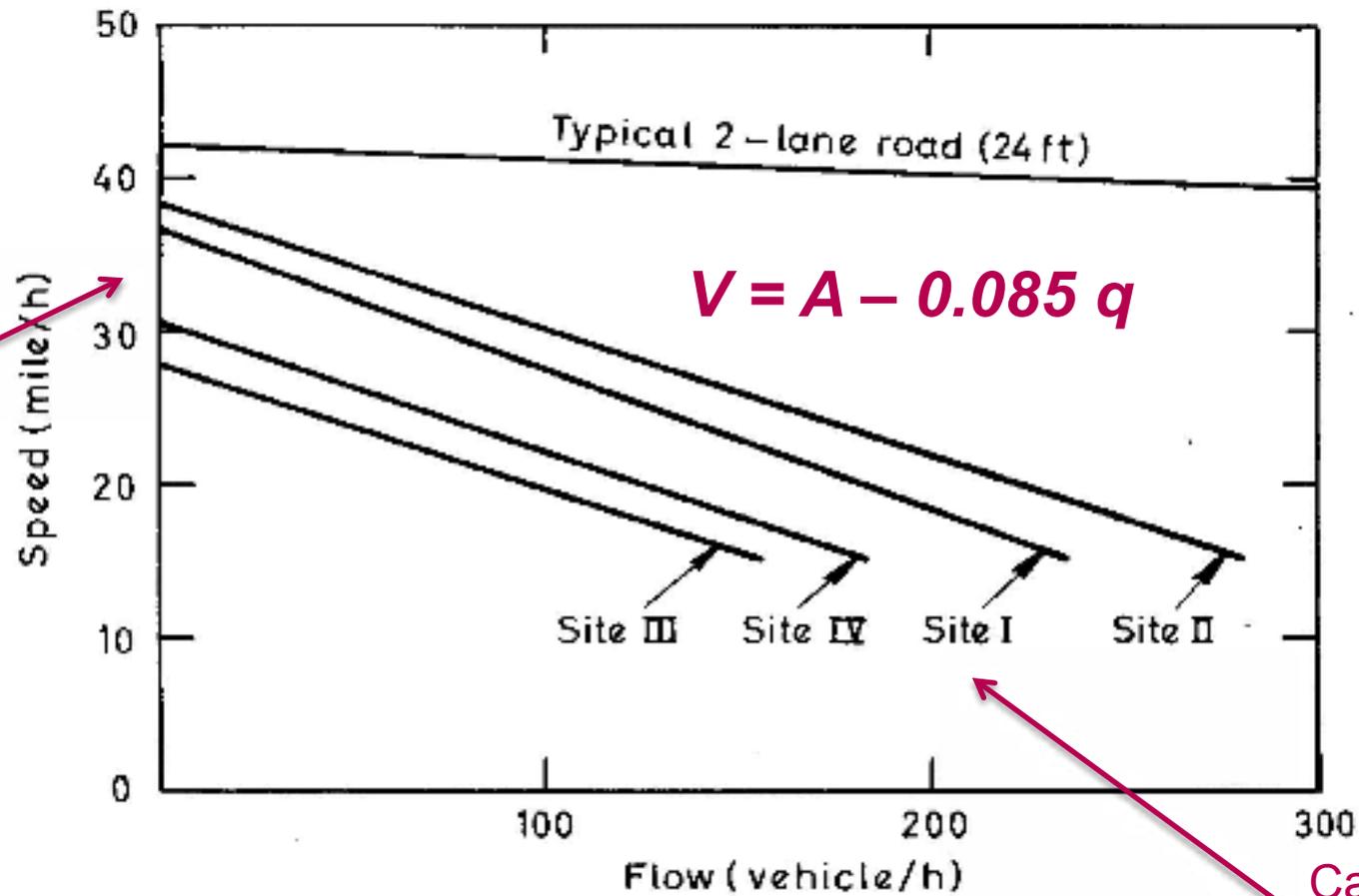


Fig. 6. COMPARISON OF SPEED-FLOW RELATIONSHIPS

Walker et al. (1967) (cont'd)

$$V = A - 0.085 q$$

But...

- Equation fails where $A < 20$ mph
(assumed to be minimum acceptable speed)
- Why should relationship be linear when approaching capacity?

Burrow (1977)

*Delays on single-lane roads with passing places
(Working Paper TSN 29R)*

- Fortran model
- Test Track experiment

Burrow (1977) (cont'd)

Fortran Model

- 180m stretch of 'road' with 'passing spaces'
- Many assumptions
 - Perfect visibility (i.e. no backing up)
 - 15 mph
 - No acceleration/deceleration
- Found capacities 100 veh/hr – 300 veh/hr depending on number of spaces

Burrow (1977) (cont'd)

Test track experiment

- Still assumes perfect visibility and slow speeds - but:
 - Acceleration/deceleration
 - Human element
- Delay almost always higher than in simulation
- Discrepancy greater when flows unbalanced

Summary of the literature

- Very limited research
- Empirically derived relationship $V = A - 0.085 q$
 - But limited sample
 - Fails at low speed
 - Over 40 years old!
- Experimental/simulated results make very broad-brush assumptions
- Consensus of capacity approx 100-300 veh/hr

The capacity of single-track lanes

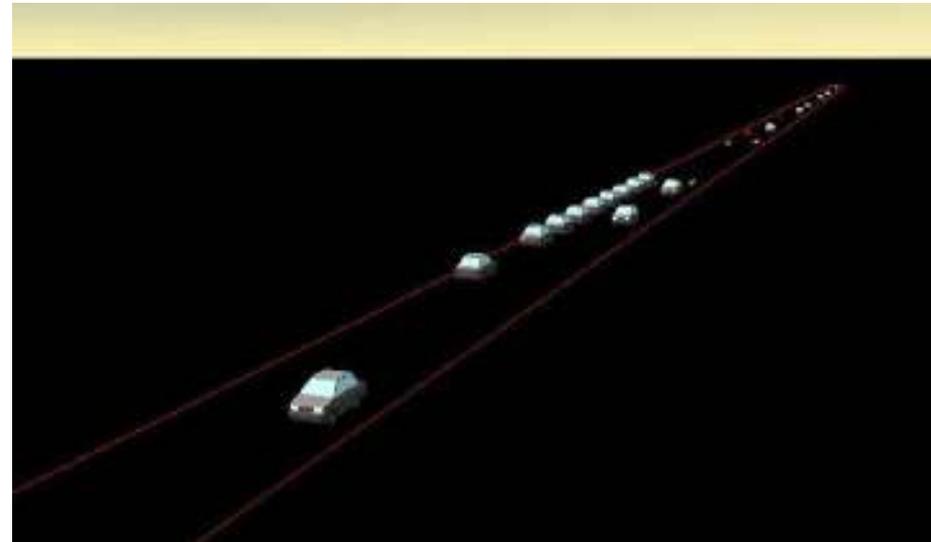
- 1) Introduction
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Methodology

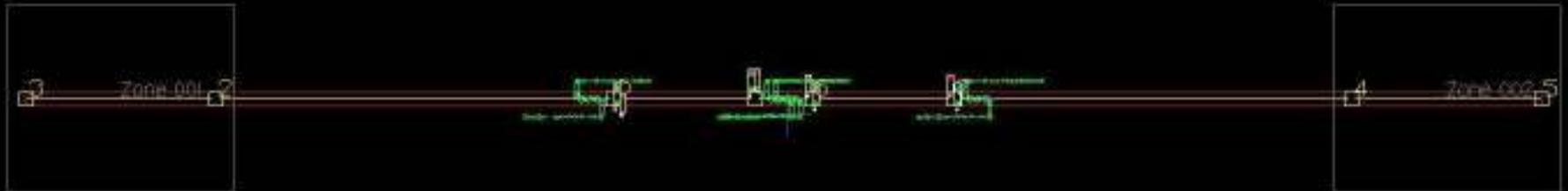
An S-Paramics model was developed to try to replicate the Burrow (1977) model:

- Two-lane approaches separated by 180m single-lane stretch
- 0-3 passing spaces
- 'Speed limit' at 15 mph
- 100% cars



Methodology (cont'd)

- Modelled using signals and loops
- Need for a 'release valve' to be coded
- Demand matrices to replicate previous modelling

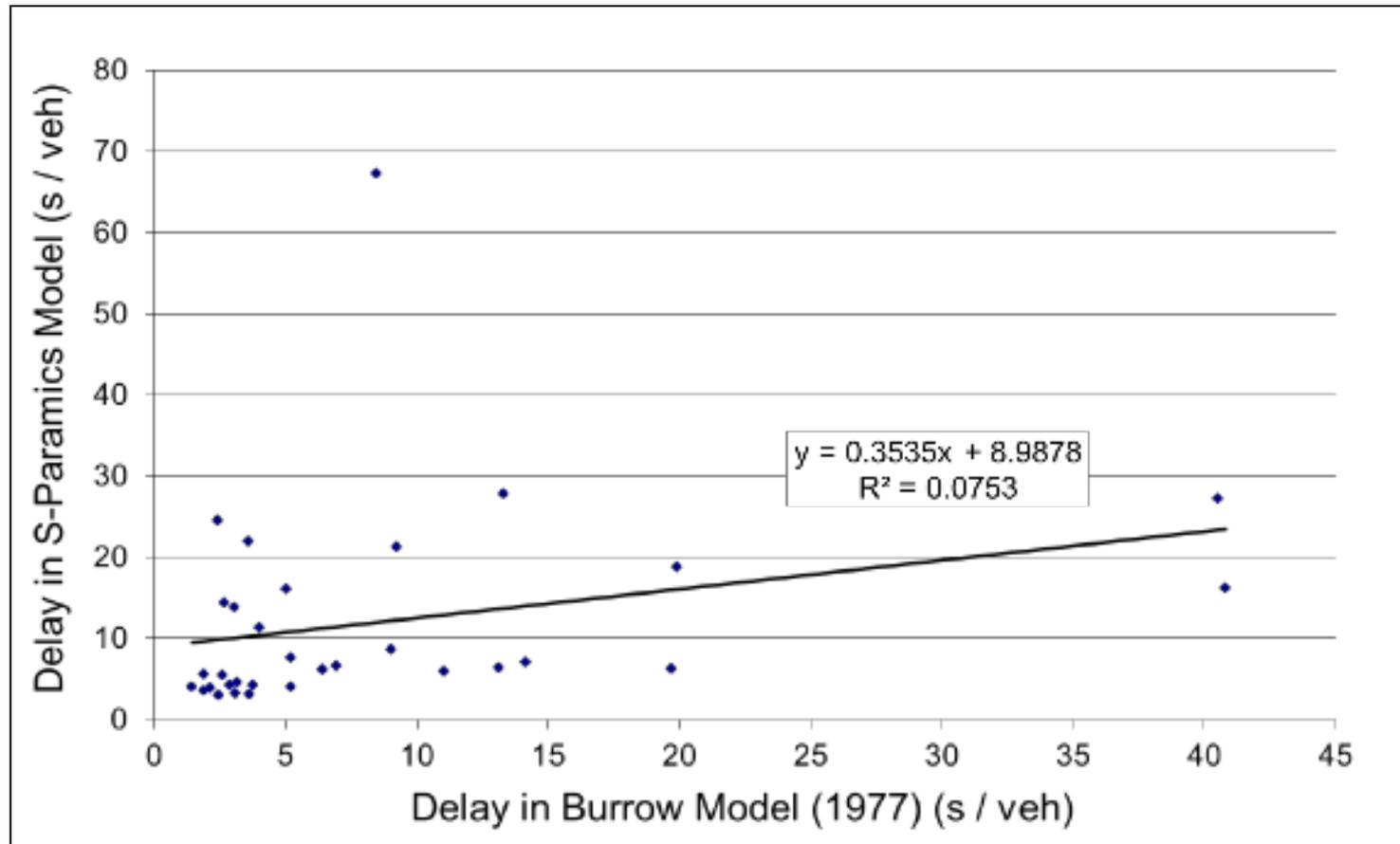


The capacity of single-track lanes

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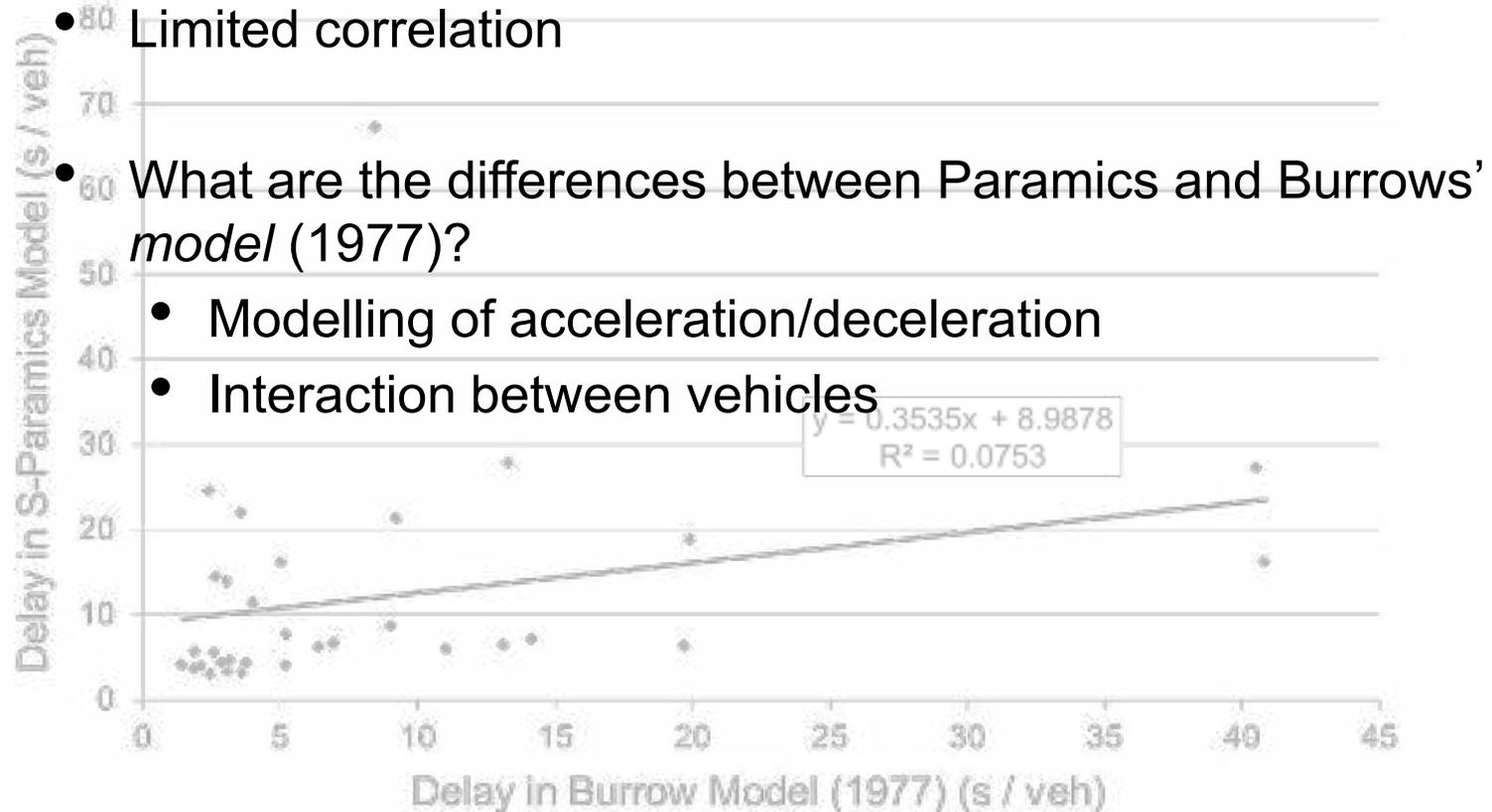


Paramics vs 1977 model

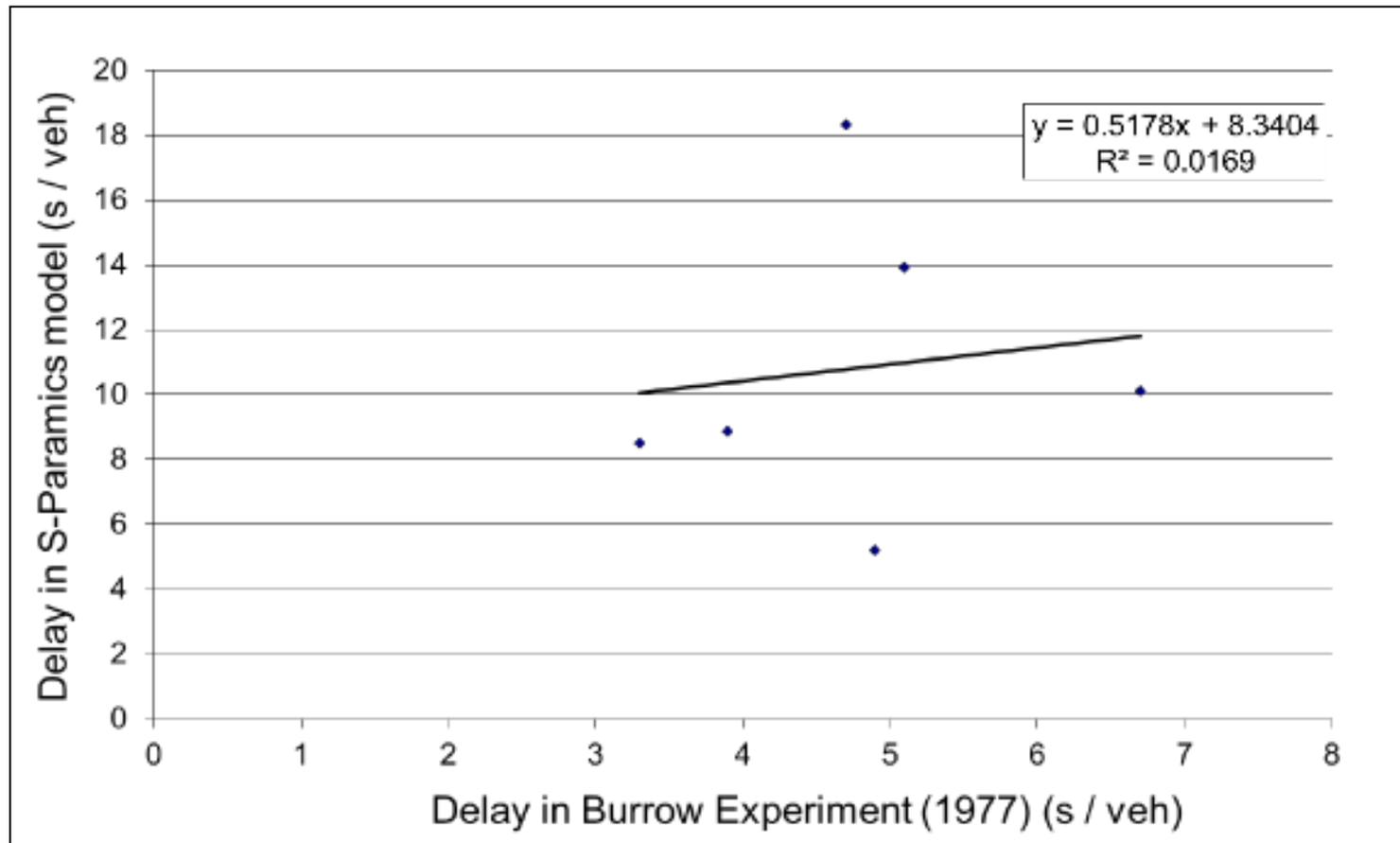


Average delay in S-Paramics model vs Burrow model for corresponding flows

Paramics vs 1977 model

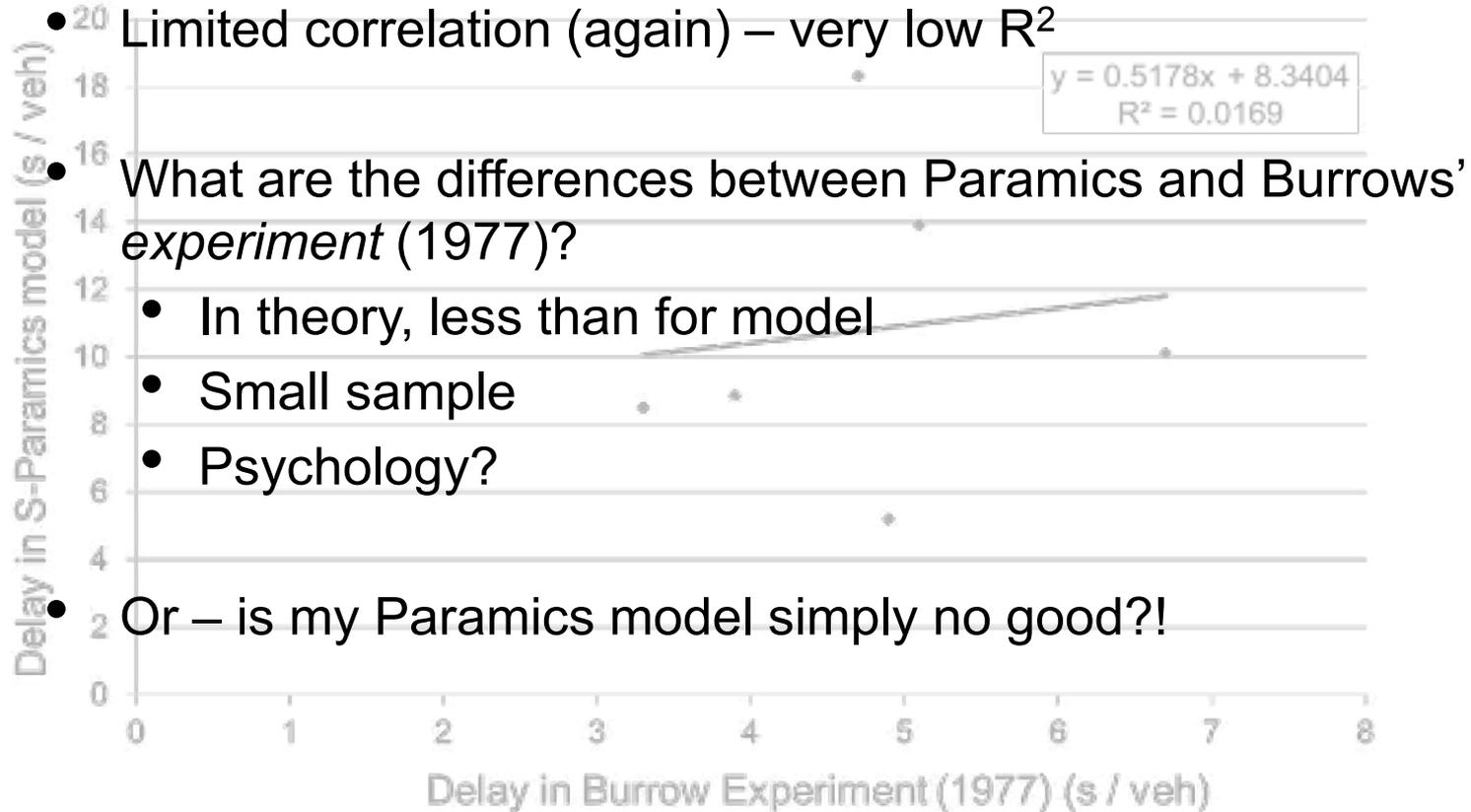


Paramics vs 1977 experiment

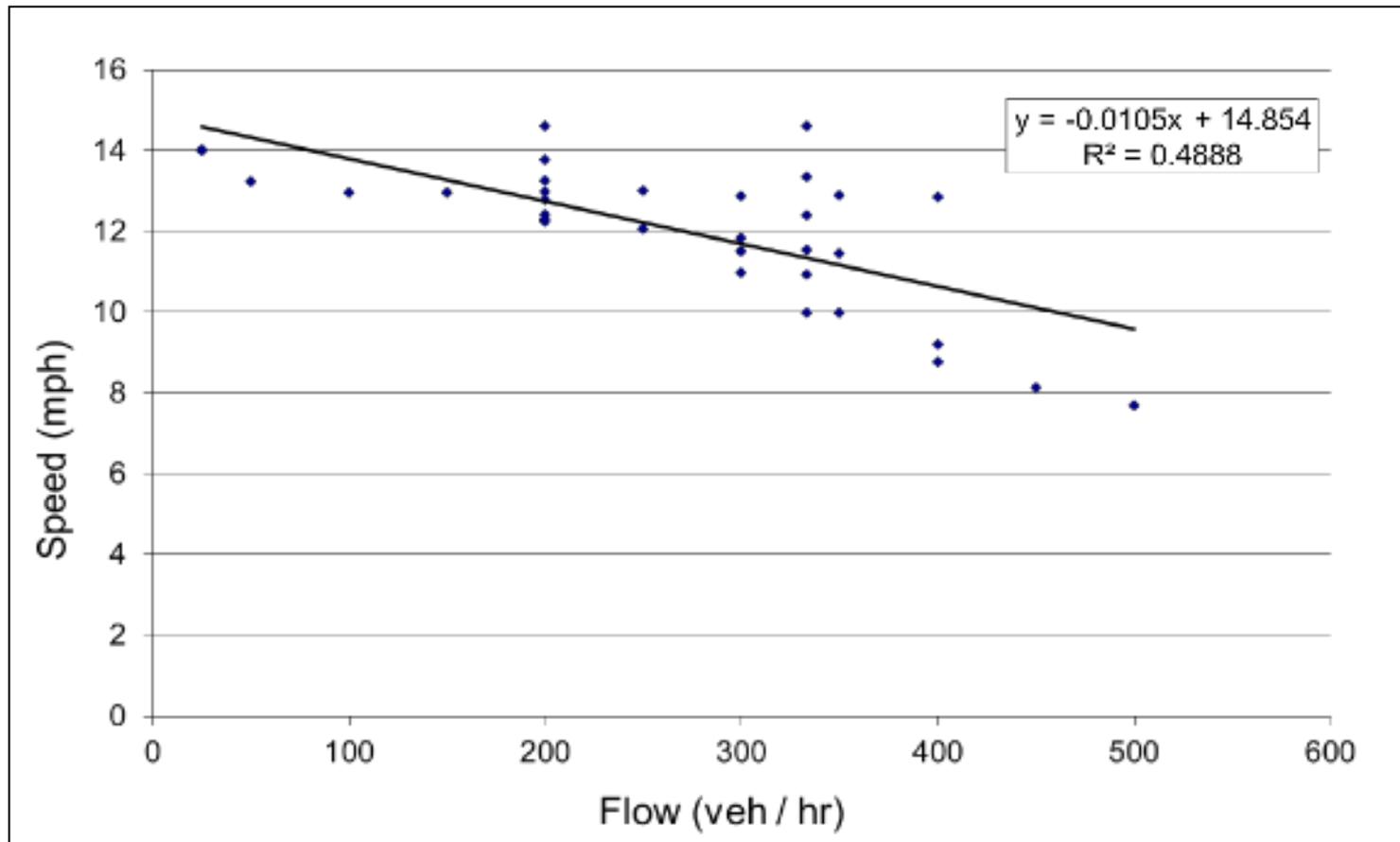


Delay in S-Paramics vs Burrow experiment for same flows and passing spaces

Paramics vs 1977 experiment

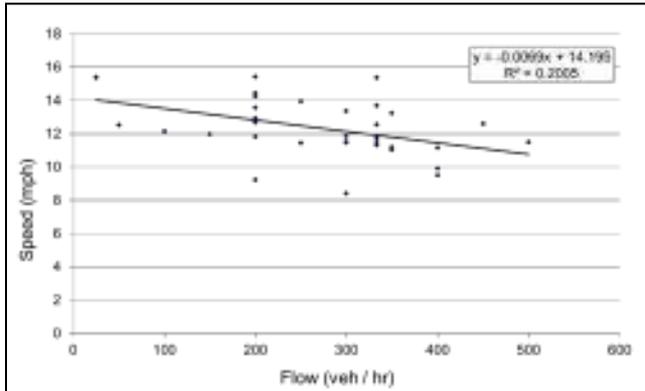


Paramics vs 1964 observations

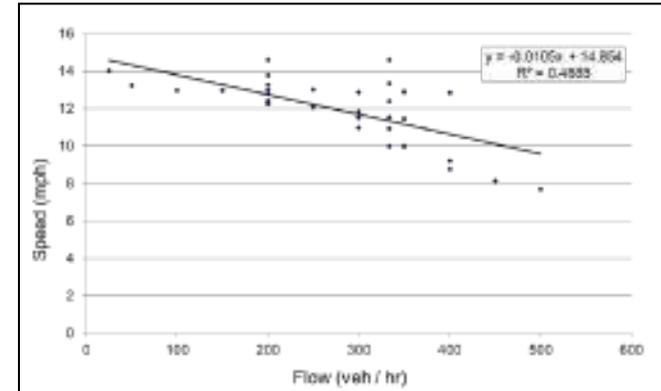


Average speed vs flow in S-Paramics (2 passing spaces)

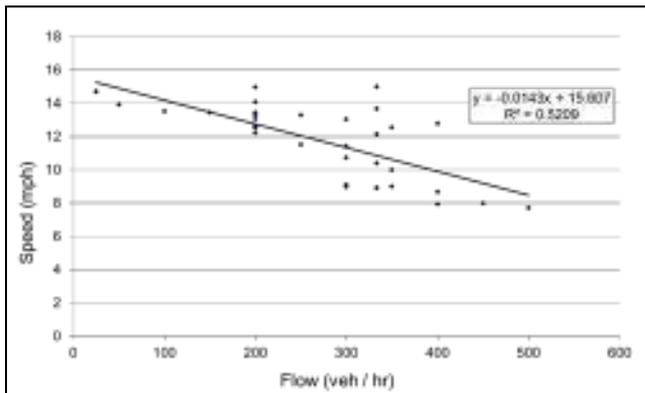
Paramics vs 1964 observations



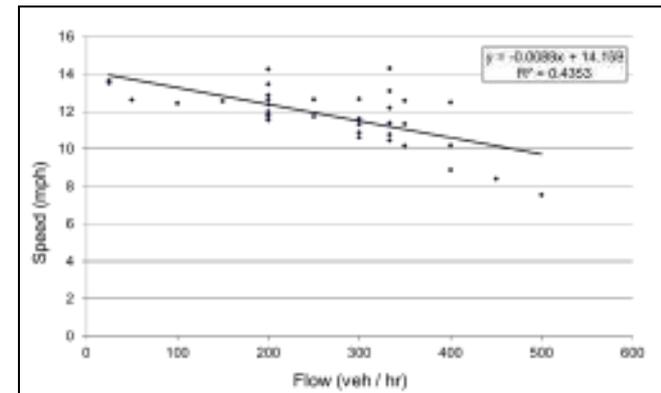
No passing spaces



2 passing spaces



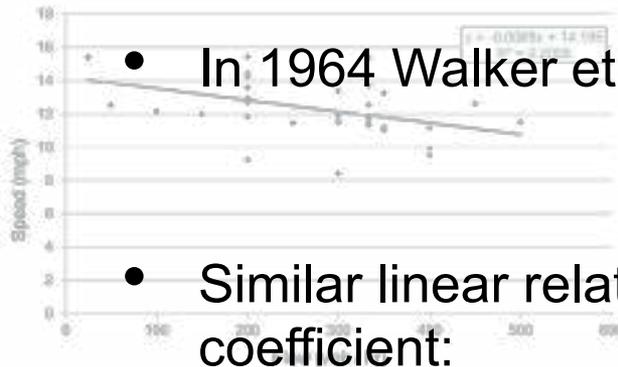
1 passing spaces



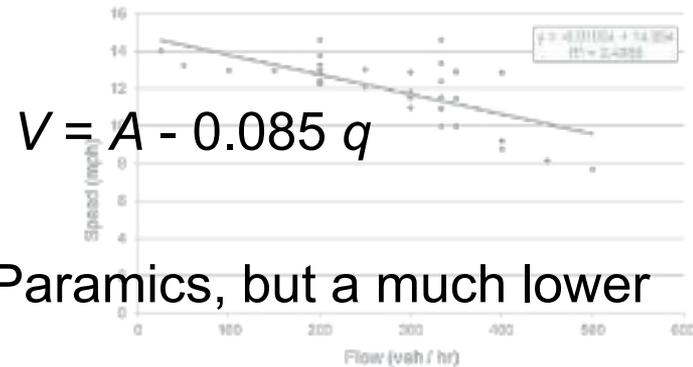
3 passing spaces

Average speed vs flow in S-Paramics

Paramics vs 1964 observations



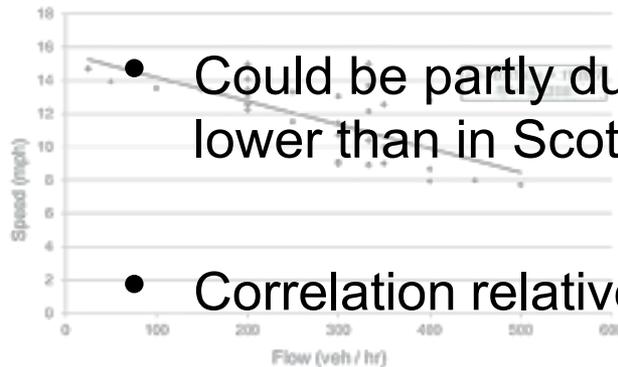
- In 1964 Walker et al. found:



$$V = A - 0.085 q$$

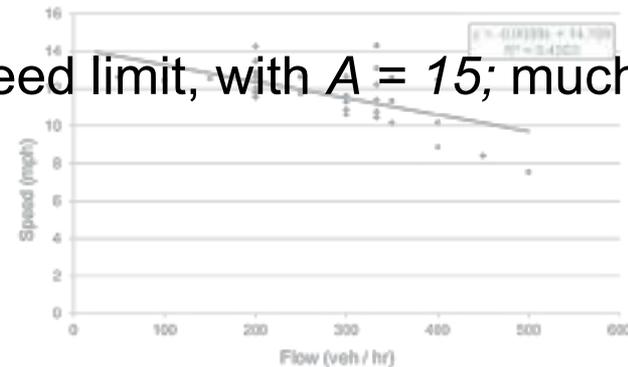
- Similar linear relationship in Paramics, but a much lower coefficient:

$$V \approx A - 0.01 q$$

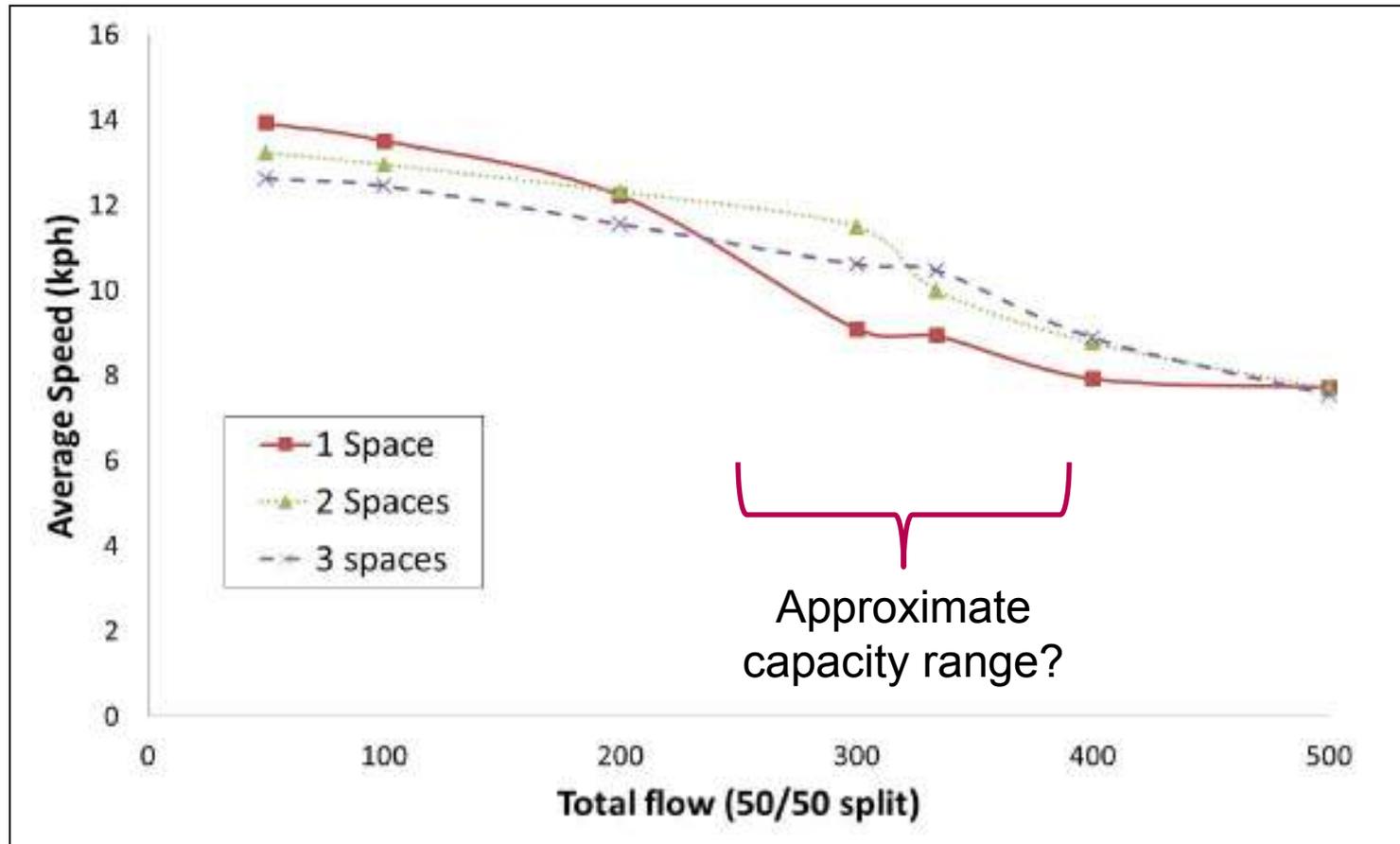


- Could be partly due to lower speed limit, with $A = 15$; much lower than in Scottish study

- Correlation relatively poor

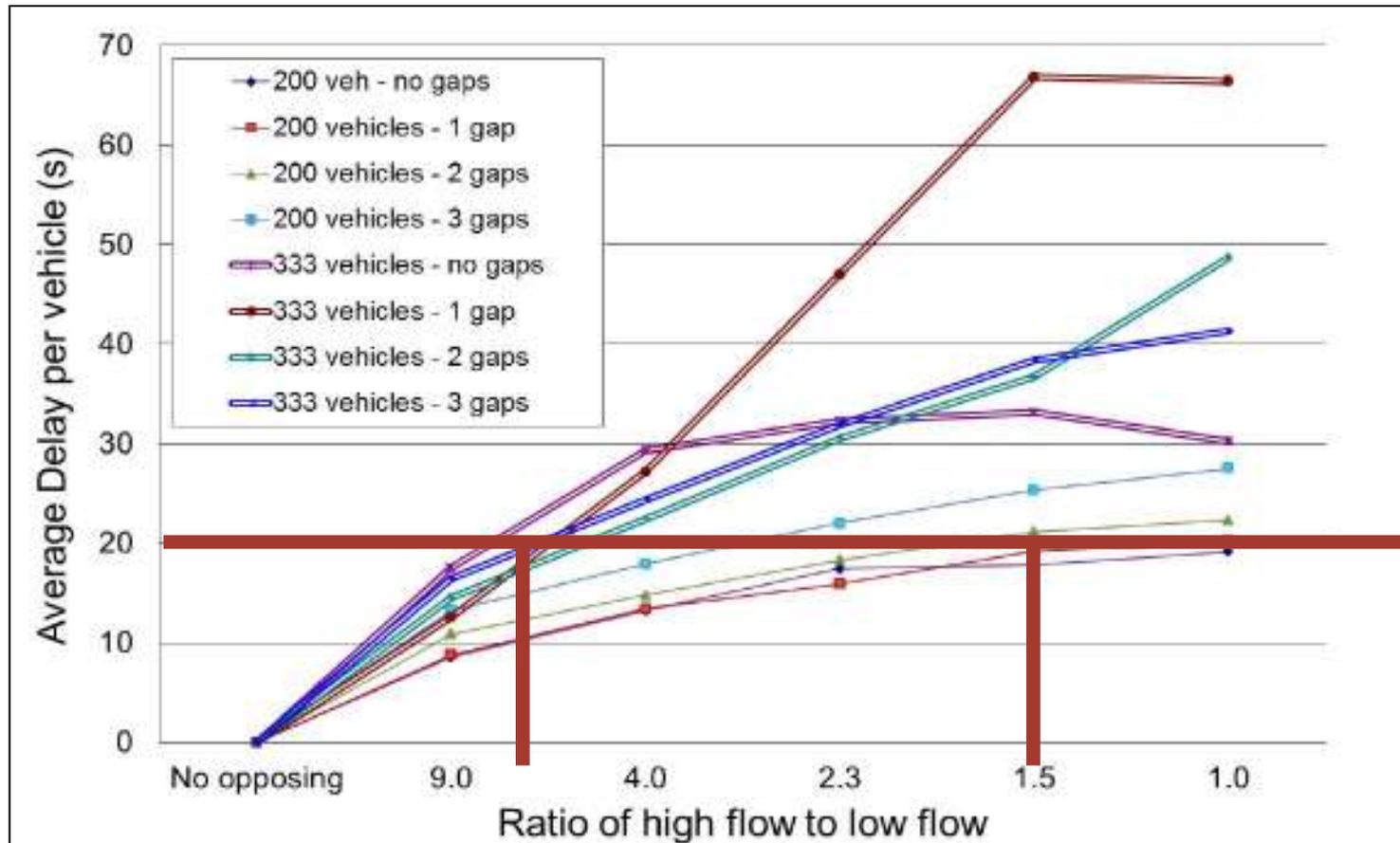


Paramics capacity estimates



Average speed vs flow in S-Paramics (equal flow in each direction)

Dependence on ratio of flows



Average delay vs flow ratios in Paramics

The capacity of single-track lanes

- 1) Introduction
- 2) Objectives of the research
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- 6) **Conclusion**
- 7) What next?



Conclusion (1)

Can S-Paramics produce results correlating with those found in previous research?

- S-Paramics replicates to some extent a linear relationship

$$V = A - g q$$

but with a very different value of g

- I suggest this may fail as q approaches link capacity

Conclusion (2)

At what level does S-Paramics suggest an effective capacity is reached?

- Delay appears to increase significantly at 300-400 veh/hr – but represents ideal conditions
- In reality is the range 100-220 (Walter et al., 1967) correct? What about changes in vehicle performance? Vehicle size and mix?

Conclusion (3)

Will tidal flow have an impact on capacity?

- It does appear so
- Lowest capacity appears to be around a 1:1 ratio

The capacity of single-track lanes

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- 7) **What next?**



Future research

- Observational studies
 - Bluetooth/ANPR/video?
 - Obtain data over an extended period of time at a range of sites
- Refine S-Paramics model
 - Different speeds
 - Vehicle mix
- Consider other forms of model
 - QUADRO?
 - Cell transmission model?
 - Can problems with modelling reversing be overcome?

Finally...

- Every lane will be unique
- Based on the available information, I believe that:
 - Effective capacity of a single-track lane with passing spaces lies somewhere between 100-300 veh/hr
 - Tidal flow is significant
- This isn't the 'final word' but an attempt to encourage further investigation and discussion.
- Have I missed anything?!

Thank you for listening

And to...

- Stephen Walford (Somerset CC)
- Emma Cockburn (LB Havering)
- Malcolm Calvert (SIAS)
- Staff of the Somerset Library Service

Written paper available: <http://sdrv.ms/UPR3Up>

Contact: RSweet@somerset.gov.uk

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[Jack M](#) - [Alexis Cousteau](#) - [Jamie McIntyre](#) - [Eric Jones](#) - [Peter Turner](#) - [Paul Anderson](#) - [xkcd.com](#)

WWW.SOMERSET.GOV.UK

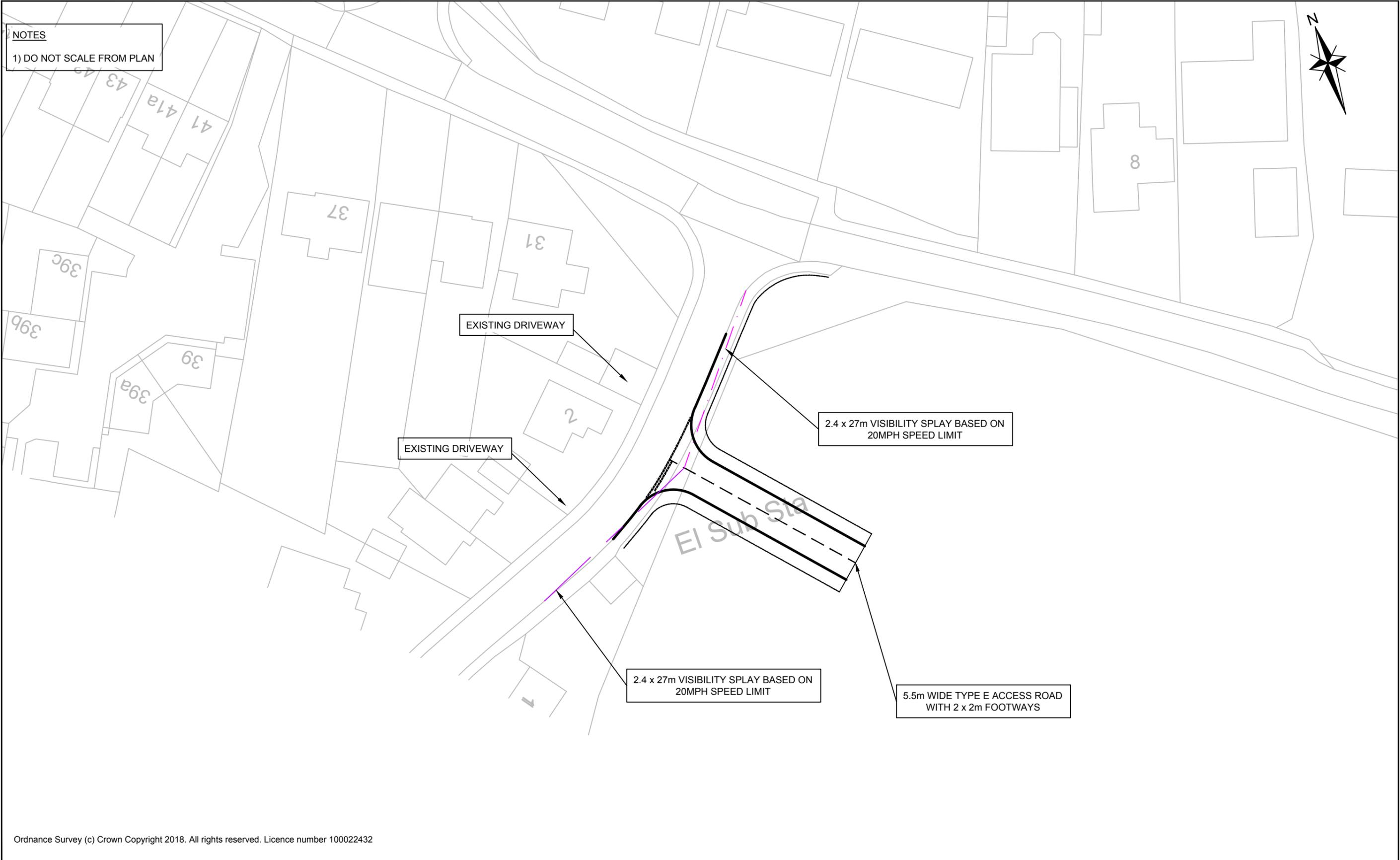




Appendix 2.

Proposed Access Detail

NOTES
1) DO NOT SCALE FROM PLAN



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		PROJECT TITLE MILL LANE, DANBURY			CLIENT STONEBOND PROPERTIES LTD			DATE 15/06/21			Cannon Consulting Engineers Cambridge House, Kentford, Newmarket, Cambs, CB8 7PN Tel: +44 (0)1638 555 107 info@cannonce.co.uk www.cannonce.co.uk	
		DRAWING TITLE PROPOSED MILLFIELDS ACCESS OPTION			DESIGNED DS	DRAWN DS	CHECKED DS	PASSED -	SCALE @ A3 NTS		ISSUE STATUS PRELIMINARY	DRAWING NUMBER ZA931 PL SK 212
REV	DESCRIPTION	CH	PA	DATE								

NOTE THE PROPERTY OF THIS DRAWING AND DESIGN IS VESTED IN CANNON CONSULTING ENGINEERS AND MUST NOT BE COPIED OR REPRODUCED IN ANY WAY WITHOUT THEIR WRITTEN CONSENT



Appendix 3.

Illustrative Masterplan

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- 1** Existing planting enhanced with native species
- 2** Site vehicular access
- 3** Landscaped entrance green
- 4** Linear landscape linking entrance and landscape feature
- 5** Landscape node
- 6** Surface water attenuation basins semi wet wildlife feature
- 7** Landscape space / feature
- 8** Private drive facing trees
- 9** Green buffer structural planting along existing boundary with development
- 10** New formalised off road pedestrian link from Mill Lane to Hyde Lane
- 11** Dog walking loop



Revision Comments

Client	Project	Date
Stonebond Properties	Mill Lane Danbury	Sep 2021
Title	Scale	Number
Concept Layout 02	1:500@A1	102.3 SK05
Rev	Rev	Rev

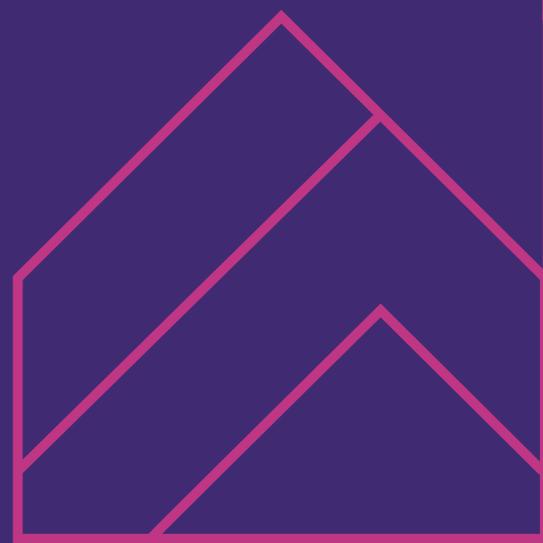
Scale Bar 1:500 @ A1

Prepared by:

Pegasus Group
Suite 4
Pioneer House
Vision Park, Histon
Cambridge
CB24 9NL

T 01223 202100
Cambridge@pegasusgroup.co.uk

Offices throughout the UK.





Appendix 2

Email Correspondence received from Essex highways Strategic Development
Manager

Sean Marten

Subject: FW: Mill Lane Danbury

From: Hilary Gore - Strategic Development Manager (South) <Hilary.Gore@essex.gov.uk>

Sent: 04 August 2021 10:08

To: Dean Smy <Dean.Smy@cannonce.co.uk>

Cc: Jack Lillott <jack.lillott@stonebondltd.com>; Jenny Robinson <jenny.robinson@chelmsford.gov.uk>; David Kwan <david.kwan@stonebondltd.com>; Matthew Oates <Matthew.Oates@stonebondltd.com>; Rob Evans <Rob.Evans@cannonce.co.uk>

Subject: RE: Mill Lane Danbury

Hi Dean,

Having reviewed your plan showing the access from Millfields and the contents of your email I am content that with the mitigation proposed, and subject to these measures being included in any planning application, including measure to discourage use of the protected section of Mill Lane, I would be happy to recommend to the Parish Council that the Highway Authority would not have an objection to the inclusion of your client's site in the Neighbourhood Plan for a maximum of 30 dwellings.

Please note the following:

The content of this communication is based on information supplied at the time of the enquiry and is not a formal response to a planning application. Please be aware that it may not reflect the contents of any formal reply made by the Highway Authority in response to an official consultation from the LPA on a planning application submitted for a proposal containing more detailed information and following comprehensive internal consultation with appropriate departments of Essex Highways; particularly if in the opinion of the Highway Authority highway safety, efficiency and accessibility standards cannot be achieved.

Kind regards

Hilary Gore
Strategic Development Manager (South)



SAFER GREENER HEALTHIER



The Highway Authority is now charging for all pre-planning application advice, full details can be found here – [Pre-App Charging](#)

From: Dean Smy [REDACTED]

Sent: 29 July 2021 09:13

To: Hilary Gore - Strategic Development Manager (South) [REDACTED]

cc: Jack Elliott <[REDACTED]>; [REDACTED]; David Kwiatkowski <[REDACTED]>

[REDACTED]; Matthew Gales <[REDACTED]>

<[REDACTED]>

Subject: RE: Mill Lane Danbury

CAUTION: This is an external email.

Dear Hilary,

Thank you for meeting with us to discuss the Mill Lane development site and subsequently reviewing our note on the existing conditions and potential improvement works. Your note was very helpful and set out some key recommendation which we have taken on board.

Having reviewed and discussed the proposals:-

- *Access from Millfields - The Mill Lane development site forms a boundary with Millfields and an access could be provided in accordance with the recommendations. We have prepared a sketch for your perusal based on the discussions – please see attached ZA931 PL SK 212.*
- *Footway enhancements as identified in Technical Note 2 (TN2) plus further widening within the highway boundary – as discussed, the footway enhancements described in TN2 could be provided by the development and secured via condition, in addition the development could deliver additional widening of the footway on Mill Lane (within the highway boundary) as recommended, details of which will be provided and agreed as part of a planning application.*
- *Contribution to CCC towards maintenance of vegetation – as discussed, Stonebond would support a contribution towards the maintenance of the existing vegetation, which could be secured via the S.106 agreement as part of a planning application.*
- *Enhancement / creation of passing places or widening in Mill Lane (south of Millfields) and In Hyde Lane (south), details to be agreed at application stage – as presented in TN2 and at the meeting widening of these sections of carriageway is possible and can be delivered by the development. The final scheme can be discussed, agreed and secured as part of a planning application at the site.*
- *Traffic Management Measures to discourage vehicular traffic from using Mill Lane (north-west) and Hyde Lane/Mill Lane south. – as noted in your recommendation, relocating the access to Millfields would act to discourage the use of Hyde Lane/Mill Lane south. This could be complemented by the proposed passing places / widening of Hyde Lane/Mill Lane south which would be agreed as part of a planning application. In addition, measures to discourage the use of Mill Lane north will be discussed and agreed with ECC as part of a future planning application.*

In summary, Stonebond are happy to support your recommendations and would welcome ECC recommending the site come forwards as part of the Neighbourhood Plan on this basis.

I would be grateful if you could let us know when and how you will be updating the Parish Council so that we can similarly inform them of our recent discussions with you.

Kind regards

Dean

Dean Smy
Associate



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Registered in London No: 05852651 Registered Office: Cambridge House, Lanwades Business Park, Kentford, Newmarket, CB8 7PN
VAT No: 895 2156 93

From: Hilary Gore - Strategic Development Manager (South) [REDACTED]
Sent: 22 July 2021 12:27
To: Dean Smy [REDACTED]
[REDACTED]
[REDACTED]
Subject: Mill Lane Danbury

Hi Dean

It was useful to meet you again last week to discuss your clients proposals in Mill Lane. I have now had a chance to review your Technical Note 2 and my comments are as follows.

Footways

Whilst there are considerable lengths of footway between the site and The Avenue which are under 2.0m in width, the measures proposed would improve the conditions for walking and be of benefit to all local residents as well as those from the proposed development if permitted. There are several pinch points along the route and there may be an opportunity to increase the width of the footway in places to improve the route still further. For example to the west of Millfields, in the vicinity of Pedlar's Path and between 87-97. I suggest that you obtain the highway boundary information from highwayrecords@essexhighways.org which will enable you to progress this, should the site be allocated in the Neighbourhood Plan.

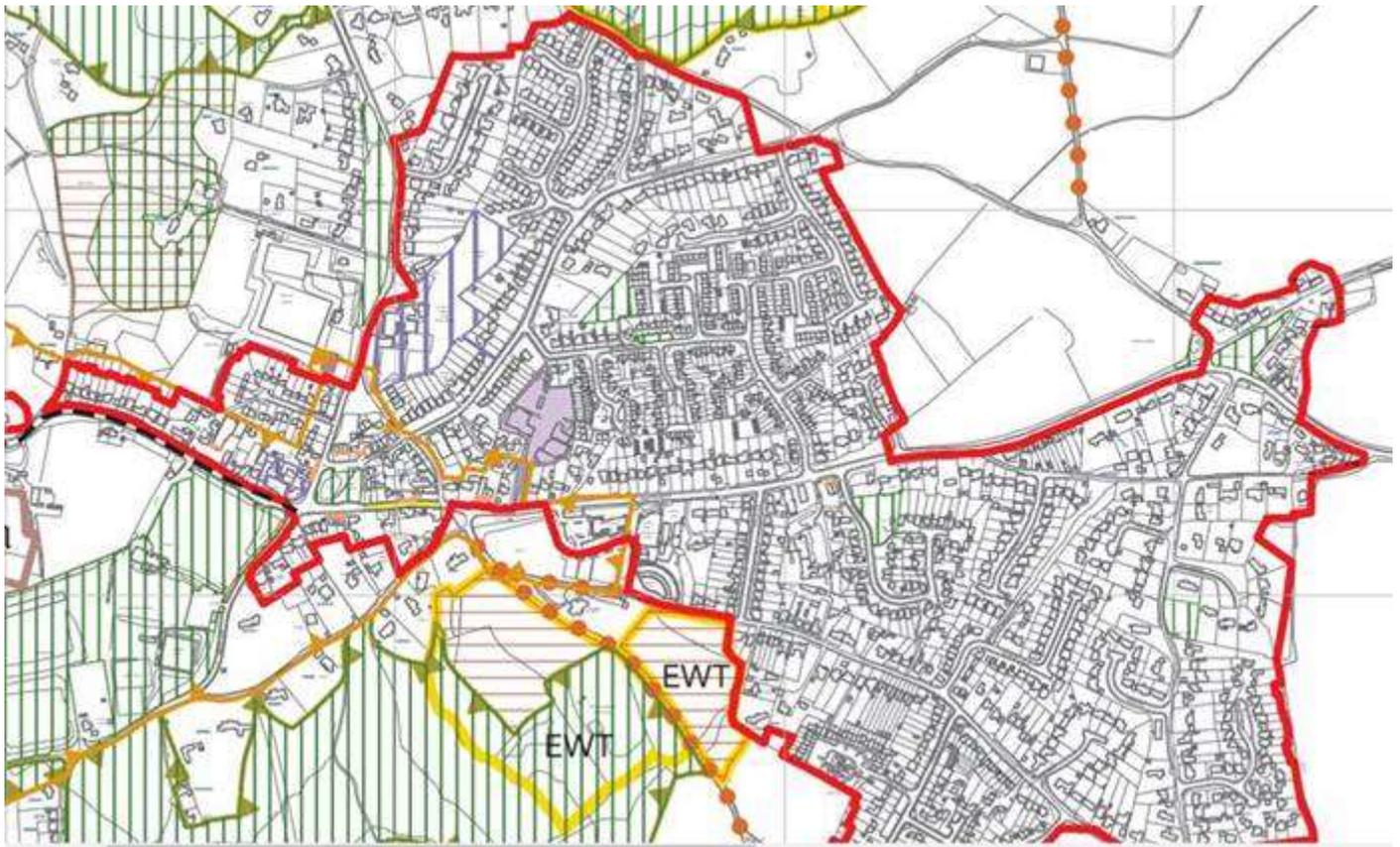
Carriageway assessment

The northern-western section of Mill Lane, between Quinlan Court and Gay Bowers Lane, is a protected Lane in Chelmsford City Council's Local Plan, an extract of which is included below (Map 12). This is a very narrow section of rural road and we would not want any additional traffic using this route. Mill Lane south is also very narrow and not suitable for intensification of use. Similarly the whole length of Hyde Lane is rural in nature and much of it is single track. Whilst there have been no recorded personal injury collisions intensification of use of Hyde Lane is not desirable.

Additional traffic management measures should be investigated to ensure that development traffic would not use these unsuitable routes.

Whilst it is acknowledged that although 4.1m can accommodate two cars passing each other, this is very tight and can lead to overrun of verges/footways. I would disagree with the statement that it

is the recommended width for two cars to pass. It is the minimum width required for two cars to pass.



- | | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------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| <ul style="list-style-type: none"> GT1 New Gypsy and Traveller Site (GT1) Proposed Employment Area (S7, SGS6, SGS3b, DM4) Existing Employment Area (S8, DM4) Rural Employment Area (S8, DM4) Green Belt (S11, DM6, DM9, DM10, DM11, DM12) Special Area of Conservation (SAC) (S4, S9, DM16)* Special Protection Area and Ramsar Site (S4, S9, DM16)* Marine Conservation Zone (S2)* Site of Special Scientific Interest (SSSI) (S4, DM16)* Scheduled Monument (S3, DM13)* Registered Park and Garden of Special Historic Interest (S3, DM13)* Local Nature Reserve (S4, DM16)* Local Wildlife Site (LoWS) (S4, DM16) EWT Essex Wildlife Trust Nature Reserve (S4, DM16)* Green Wedge (S11, DM7, DM9, DM10, DM11, DM12) Protected Lane (S3, DM17) Conservation Area (S3, DM13) Area for Conservation / Strategic Landscape Enhancement (SGS7a) Country Park* Proposed Country Park (SGS3, SGS6) Land Allocated for Future Recreation Use and / or SUDS (S4, SGS3, SGS7a) | <ul style="list-style-type: none"> Proposed Chelmsford North East By Proposed Chelmsford North East By Route Based Strategy (S9) Strategic Trunk Route Strategic Non-Trunk Route Regional Route Location for Primary School Existing School, Further / Higher Ed Retail Allocation (SGS10) Primary Shopping Area (S12, DM5) Primary Frontage (S12, DM5) Secondary Frontage (S12, DM5) Principal Neighbourhood Centre (S1) Retail Frontage of Principal and Loc SPA Special Policy Area (S7, SPA1-SPA4) Hazardous Substance Site Safegua Flood Zone 2 (S2, DM18)* Flood Zone 3 (S2, DM18)* ▲ Flood Alleviation Scheme Air Quality Management Area (DM3) Mineral and Waste Site* |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------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Capacity

I note that you have carried out traffic counts in May 2021, ECC is not accepting any traffic counts undertaken between the end of March 2020 and the present day because of unprecedented times we are in with the pandemic. ECC is currently advising that traffic counts can be undertaken from mid-September when schools and colleges have returned after the summer break, but this will be reviewed should the national restrictions change. However, the 2021 count is a useful comparison with the 2017 data and does reflect our countywide data that there has been a reduction in car trips, as you would expect given the current situation. ECC is accepting speed surveys at the present time, and the data collected is useful in that it demonstrates that 85th percentile speeds are 30mph or lower.

Your assessment of the capacity of a single track road is noted, it is agreed that there is very little guidance on this matter.

The distribution of traffic appears to have been based on existing link flows rather than distribution data from existing movements at Millfields which would provide a more realistic assessment of trip distribution. As pointed out above intensification of use of Mill Lane north-west, Hyde Lane north and south and Mill Lane south is not desirable and measures would need to be implemented to discourage use of these routes. The traffic flow data shows that existing traffic movements between Mill Lane and the A414 seem to be predominantly via the protected lane, therefore it is particularly important that development traffic should be discouraged from intensifying the use of this route.

Site Access

If development were to be permitted, a type E access road with two footways would be the appropriate category of road for a development of 30 dwellings. The proposed access to the site should, however, be via Millfield and located at least 20m from the junction with Mill Lane. Visibility splays in accordance with Manual for Streets for a 30mph road should be provided. This would be necessary to discourage vehicles from using the narrow rural lanes to the south.

Proposed Mitigation

It is acknowledged that the footway improvements identified in Technical Note 2 would provide enhanced accessibility for pedestrians.

The section of Mill Lane between Millfields and Hyde Lane is below 4.1m in places. However, as it would be necessary to ensure that traffic would not be encouraged to use this southern route, widening may not be appropriate especially as there is good visibility along this stretch. There are, however, areas where the verge is overrun and these could be formalised to provide surfaced passing places.

Similarly the section of Hyde Lane south along the site boundary is very rural in nature with mature trees along the frontage. The creation of more passing places and/or formalising/surfacing the existing overrun areas would, at this stage, appear to be more appropriate.

A contribution towards maintenance of vegetation to footway widths has been suggested in order to increase the available width of footway in places, this is not a practical solution for ECC the maintenance team for a number of reasons but it may be an option to pursue with Chelmsford City Council should the site be allocated in the Neighbourhood Plan.

Conclusions

Having considered the two technical notes and the discussed the highway matters at pre-app meetings, I still have some concerns about the implication of 30 dwellings in Mill Lane. However,

should the access be from Millfields to encourage vehicular traffic to turn left out of the site and a package of mitigation measures be provided in association with any development then I would consider amending my recommendation to Danbury Parish Council. This would be on the basis of an absolute maximum of 30 dwellings, with a mitigation package of:

- Access from Millfields
- Footway enhancements as identified in Technical Note 2 plus further provision of footway widening in Mill Lane where it can be achieved within the existing highway limits.
- Possible contribution to CCC towards maintenance of vegetation to increase available footway widths.
- Enhancement/creation of passing places (or widening) in Mill Lane south of Millfields and in Hyde Lane south, details to be agreed at application stage..
- Traffic management measures to discourage vehicular traffic from using Mill Lane north-west which is a protected lane, and Hyde Lane/Mill Lane south.

I hope this is helpful. Please can you confirm that this would be acceptable to your client before I let the Parish Council know about the outcome of our discussions.

I look forward to hearing from you.

Kind regards

Hilary Gore
Strategic Development Manager (South)



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The Highway Authority is now charging for all pre-planning application advice, full details can be found here – [Pre-App Charging](#)

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

Cambridge

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Comment

Consultee Mr Kenneth Axon (1359566)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mr Kenneth Axon (1359566)

Comment ID DNP-127

Response Date 18/06/24 22:28

Status Processed

Submission Type Email

Version 0.3

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Site E: Land at Mayes Lane

Question 2

Please add your comments below

This is to confirm my approval of the whole of the Danbury Neighbourhood Plan.
As I live nearby (address redacted by CCC), in particular I approve of Site E: Land at Mayes Lane paragraphs 5.35 to 5.40.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

Comment

Consultee Mr Chris Waldron (1360660)
Email Address
Company / Organisation Defence Infrastructure Organisation (DIO)
Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation
Comment by Defence Infrastructure Organisation (DIO) (Mr Chris Waldron - 1360660)
Comment ID DNP-128
Response Date 19/06/24 09:47
Status Processed
Submission Type Email
Version 0.6

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below General

Question 2

Please add your comments below

Please see attached letter

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

If you wish to submit any supporting information, please upload it here [20230604_mod_response.pdf](#)



Defence
Infrastructure
Organisation

Ministry of Defence
Safeguarding Department
DIO Head Office
St George's House
DMS Whittington
Lichfield
Staffordshire WS14 9PY

Your reference: Danbury Neighbourhood
Plan Consultation
Our reference: 10063186

E-mail: [DIO-Safeguarding-
Statutory@mod.gov.uk](mailto:DIO-Safeguarding-Statutory@mod.gov.uk)

Planning Policy Team
Spatial Planning
City Council
Civic Centre
Duke Street
Chelmsford
CM1 1JE

19th June 2024

Dear Sir/Madam

It is understood that Chelmsford City Council are undertaking a consultation regarding the Danbury draft Neighbourhood Plan. The plan proposes local planning policies for Danbury.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a statutory consultee in the UK planning system to ensure designated zones around key operational defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites are not adversely affected by development outside the MOD estate. For clarity, this response relates to MOD Safeguarding concerns only and should be read in conjunction with any other submissions that might be provided by other MOD sites or departments.

Paragraph 101 of the National Planning Policy Framework 2023 requires that planning policies and decisions take into account defence requirements by 'ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.' Statutory consultation of the MOD occurs as a result of the provisions of the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002 (DfT/ODPM Circular 01/2003) and the location data and criteria set out on safeguarding maps issued to Local Planning Authorities by the Department for Levelling Up, Housing and Communities (DLUHC) in accordance with the provisions of that Direction.

The review or drafting of planning policy provides an opportunity to better inform developers of the statutory requirement that MOD is consulted on development that triggers the criteria set out on Safeguarding Plans, and the constraints that might be applied to development as a result of the requirement to ensure defence capability and operations are not adversely affected.

The MOD have an interest within the Danbury draft Neighbourhood Plan, in a new technical asset known as the East 2 WAM Network, which contributes to aviation safety by feeding into the air traffic management system in the Eastern areas of England. There is the potential for development to impact on the operation and/or capability of this new technical asset which consists of nodes and connecting pathways, each of which have their own consultation criteria. Elements of this asset pass through the Danbury draft Neighbourhood Plan area of interest.

The Safeguarding map associated with the East 2 WAM Network has been submitted to DLUHC for issue. As is typical, the map provides both the geographic extent of consultation zones and the criteria associated with them. Within the statutory consultation areas identified on the map are zones where the key concerns are the presence and height of development, and where introduction of sources of electro-magnetic fields (such as power lines or solar photo voltaic panels and their associated infrastructure) are of particular concern. Wherever the criteria are triggered, the MOD should be consulted in order that appropriate assessments can be carried out and, where necessary, requests for required conditions or objections be communicated.

In addition to the safeguarding zone identified, the MOD may also have an interest where development is of a type likely to have any impact on operational capability. Usually this will be by virtue of the scale, height, or other physical property of a development. Examples these types of development include, but are not limited to:

- Solar PV development which can impact on the operation and capability of communications and other technical assets by introducing substantial areas of metal or sources of electromagnetic interference. Depending on the location of development, solar panels may also produce glint and glare which can affect aircrew or air traffic controllers.
- Wind turbines may impact on the operation of surveillance systems such as radar where the rotating motion of their blades can degrade and cause interference to the effective operation of these types of installations, potentially resulting in detriment to aviation safety and operational capability. This potential is recognised in the Government's online Planning Practice Guidance which contains, within the Renewable and Low Carbon Energy section, specific guidance that both developers and Local Planning Authorities should consult the MOD where a proposed turbine has a tip height of, or exceeding 11m, and/or has a rotor diameter of 2m or more; and,
- Any development that would exceed a height of 50m above ground level. Both tall (of or exceeding a height of 50m above ground level) structures and wind turbine development introduce physical obstacles to low flying aircraft

For your convenience, please find below a table which provides a summary of the safeguarding zones that would apply to each of the potential housing sites identified and the forms of development that would trigger MOD consultation.

POTENTIAL HOUSING ALLOCATIONS	SAFEGUARDING ZONE(S) AFFECTED	POTENTIAL MOD SAFEGUARDING ASSESSMENT REQUIREMENTS
Site Specific Policy A: Land at Sandpit Field	East 2 WAM Network	Development of or exceeding 45.7m in height above ground level or development of any overhead power lines above 2kv will trigger statutory consultation requirement
Site Specific Policy C: Ex Play Area, South of Jubilee Rise	East 2 WAM Network	Development of or exceeding 45.7m in height above ground level will trigger statutory consultation requirement.
Site Specific Policy D: Danecroft, Woodhill Road	East 2 WAM Network	Development of or exceeding 45.7m in height above ground level or development of any overhead power lines above 2kv will trigger statutory consultation requirement
Site Specific Policy E: Land at Mayes Lane	East 2 WAM Network	Development of or exceeding 15.2m in height above ground level or development of any overhead power lines above 2kv will trigger statutory consultation requirement

I trust this clearly explains our position on this update. Please do not hesitate to contact me should you wish to consider these points further.

Yours sincerely

DIO Assistant Safeguarding Manager

Comment

Agent Mr Andrew Ransome (1360871)

Email Address

Company / Organisation ADP Ltd

Address

Consultee Mr and Mrs G and J Thompson and Wilson (1360873)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mr and Mrs G and J Thompson and Wilson (1360873)

Comment ID DNP-129

Response Date 19/06/24 11:20

Status Processed

Submission Type Email

Version 0.4

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below DNP1; Site E: Land at Mayesfield

Question 2

Please add your comments below

(See attached letter)

Thank you for the opportunity to comment on the Danbury Neighbourhood Plan. We are the homeowners of Mayesfield, which is referred to as "Site E: Land at Mayes Lane" within the Danbury Neighbourhood Plan.

The Danbury Neighbourhood Plan has been positively prepared and represents a 'sound' overarching plan to guide the spatial strategy for the village.

We have been involved in the neighbourhood planning process from very early in the process and have developed a strong working relationship with the Danbury Neighbourhood Plan Working Group.

Policy DNP1 of the Neighbourhood Plan meets the collective vision that has been developed through extensive consultation and evidence gathering to meet the needs and aspirations of the local community.

The identified site allocation in Policy DNP1 and Site Specific Policy E: Land at Mayes Lane, would represent a logical extension to the village, within a central location, close to the services and facilities, that would contribute to the strategic aims of the adopted Chelmsford Local Plan and that of the Danbury Neighbourhood Plan.

We would further comment:

All existing internal hedges on this land will be retained and new native hedging will be planted along the improved Mayes Lane accessway.

There are many trees on this land already, creating good screening.

The proposed height limitation for the new dwellings of 1.5 storeys will ensure that they are particularly discrete because the site on the slope down to Copt Hill has already been lowered to create an even level for the tennis court formerly on the site.

This land at Mayes Lane is available for development and there are no known constraints that would prevent it from being delivered.

We can confirm that the development of this site is both viable and deliverable. We are keen to submit a planning application soon after the adoption of the Danbury Neighbourhood Plan.

As a whole, the Danbury Neighbourhood Plan sets out an appropriate framework to develop all the site allocations in a planned and integrated manner.

The Neighbourhood Plan process has fully considered all the reasonable alternative sites, and through this process, it is clear that this site closely matches the aim and objectives of the Neighbourhood Plan.

The Neighbourhood Plan approach followed complies with the guidance set out in the paragraph 098 of the PPG [Reference ID: 41-098-20190509] as it is clear that the Parish Council has followed the relevant guidance and neighbourhood planning toolkits on assessing sites and they have carried out a

strategic environment assessment.

I trust these comments will be considered during the Independent Examination and we look forward to the Danbury Neighbourhood Plan being taken forward to the Referendum.

I understand that the Examination will be heard via written representations, but in the event that a Public Hearing is called, we would request attendance at such a hearing.

If you wish to submit any supporting information, please upload it here [DNP-129 G and J Thompson and Wilson - Attachment.pdf](#)

Planning Policy Team
Spatial Planning Services
Chelmsford City Council
Civic Centre
Duke Street
Chelmsford
CM1 1JE

18th June 2024

Dear Sir,

Danbury Neighbourhood Plan: Regulation 16

Thank you for the opportunity to comment on the Danbury Neighbourhood Plan. We are the homeowners of Mayesfield, which is referred to as “Site E: Land at Mayes Lane” within the Danbury Neighbourhood Plan.

The Danbury Neighbourhood Plan has been positively prepared and represents a ‘sound’ overarching plan to guide the spatial strategy for the village.

We have been involved in the neighbourhood planning process from very early in the process and have developed a strong working relationship with the Danbury Neighbourhood Plan Working Group.

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We would further comment:

- All existing internal hedges on this land will be retained and new native hedging will be planted along the improved Mayes Lane accessway.
- There are many trees on this land already, creating good screening.
- The proposed height limitation for the new dwellings of 1.5 storeys will ensure that they are particularly discrete because the site on the slope down to Copt Hill has already been lowered to create an even level for the tennis court formerly on the site.
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As a whole, the Danbury Neighbourhood Plan sets out an appropriate framework to develop all the site allocations in a planned and integrated manner.

The Neighbourhood Plan process has fully considered all the reasonable alternative sites, and through this process, it is clear that this site closely matches the aim and objectives of the Neighbourhood Plan.

The Neighbourhood Plan approach followed complies with the guidance set out in the paragraph 098 of the PPG [Reference ID: 41-098-20190509] as it is clear that the Parish Council has followed the relevant guidance and neighbourhood planning toolkits on assessing sites and they have carried out a strategic environment assessment.

I trust these comments will be considered during the Independent Examination and we look forward to the Danbury Neighbourhood Plan being taken forward to the Referendum.

I understand that the Examination will be heard via written representations, but in the event that a Public Hearing is called, we would request attendance at such a hearing.

Yours faithfully,

GUY BRADSHAW THOMPSON and ANNA JULIA WILSON

Comment

Consultee Mr Richard Agnew (1301644)
Email Address
Company / Organisation Gladman Developments Ltd
Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation
Comment by Gladman Developments Ltd (Mr Richard Agnew -1301644)
Comment ID DNP-130
Response Date 19/06/24 11:42
Status Processed
Submission Type Email
Version 0.3

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Vision, DNP1, DNP2, DNP6, DNP14

Question 2

Please add your comments below

Please see attached letter

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

If you wish to submit any supporting information, please upload it here [DNP-130 Gladman - Attachment.pdf](#)



Danbury
Neighbourhood Plan

Regulation 16 Consultation

June 2023



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1 INTRODUCTION

1.1 Context

1.1.1 These representations provide Gladman's response to the Danbury Neighbourhood Plan (DNP) under Regulation 16 of the Neighbourhood Plan (General) Regulations 2012.

1.1.2 Gladman Developments Ltd specialise in the promotion of strategic land for residential development and associated community infrastructure and have considerable experience in contributing to the Development Plan preparation process having made representations on numerous planning documents throughout the UK alongside participating in many Local Plan and Neighbourhood Plan examinations.

1.1.3 Through these representations, Gladman provides an analysis of the DNP and the policy choices promoted within the draft Plan. Comments made by Gladman through these representations are provided in consideration of the DNP's suite of policies and its ability to fulfil the Neighbourhood Plan Basic Conditions as established by paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended) and supported by the Neighbourhood Plan chapter of the PPG.

1.1.4 Gladman are promoting land at Maldon Road, Danbury (assessed as Site D4 in neighbourhood plan documentation) for development within the neighbourhood plan area and a site submission is included within these representations at Section 6.

2 LEGAL REQUIREMENTS, NATIONAL POLICY & GUIDANCE

2.1 Legal Requirements

2.1.1 Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The basic conditions that the DNP must meet are as follows:

“(a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.

(d) The making of the order contributes to the achievement of sustainable development.

(e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).

(f) The making of the order does not breach, and is otherwise compatible with, EU obligations.

(g) Prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).”

2.2 National Planning Policy Framework

2.2.1 The National Planning Policy Framework (the Framework) sets out the Government’s planning policies for England and how these are expected to be applied. In doing so it sets out the requirements for the preparation of neighbourhood plans to be in conformity with the strategic priorities for the wider area and the role they play in delivering sustainable development to meet development needs.

2.2.2 At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread through plan-making and decision-taking. This means that plan makers should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed

housing needs, with sufficient flexibility to adapt to rapid change. This requirement is applicable to neighbourhood plans.

- 2.2.3** Planning Practice Guidance (PPG) makes clear that neighbourhood plans should conform to national policy requirements and take account of the most up-to-date evidence. This is so that the DNP can assist Chelmsford City Council (CCC) in delivering sustainable development and be in accordance with basic condition (d).
- 2.2.4** The application of the presumption in favour of sustainable development will have implications for how communities engage with neighbourhood planning. Paragraph 13 of the Framework makes clear that Qualifying Bodies preparing neighbourhood plans should develop plans that support strategic development needs set out in Local Plans, including policies for housing development and plan positively to support local development.
- 2.2.5** Paragraph 15 further makes clear that neighbourhood plans should set out a succinct and positive vision for the future of the area. A neighbourhood plan should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. Neighbourhood plans should seek to proactively drive and support sustainable economic development to deliver the homes, jobs and thriving local places that the country needs, whilst responding positively to the wider opportunities for growth.
- 2.2.6** Paragraph 29 of the Framework makes clear that a neighbourhood plan must be aligned with the strategic needs and priorities of the wider area and plan positively to support the delivery of sustainable growth opportunities.

3 RELATIONSHIP TO LOCAL PLANS

3.1 Adopted Development Plan

3.1.1 To meet the requirements of the Framework and the Neighbourhood Plan Basic Conditions, neighbourhood plans should be prepared to conform to the strategic policy requirements set out in the adopted Development Plan.

3.1.2 The adopted Development Plan relevant to the preparation of the DNP and the Development Plan which the DNP will be tested against is the Chelmsford Local Plan 2016-2036, adopted in May 2020. This document contains the policies and spatial strategy to guide development throughout the plan period.

3.1.3 The plan specifically sets a target of around 100 homes to be delivered within or adjacent to the settlement boundary. Development constraints around the settlement are recognised with the conservation and enhancement of the Sites of Special Scientific Interest (SSSI) in and around Danbury (Blake's Wood and Lingwood Common SSSI, Woodham Walter Common SSSI and Danbury Common SSSI) a key consideration. Landscape and highway constraints are also recognised.

3.2 Emerging Development Plan

3.2.1 Chelmsford City Council are developing a new Local Plan to guide development over the period up to 2041, with the draft Local Plan currently being consulted upon alongside this consultation.

3.2.2 The draft Local Plan does not currently target any additional growth to Danbury but this is predicated on their proposed strategy allocating the strategic site at Hammonds Farm. We are aware that there are significant objections to the proposed allocation of this site and the strategy may yet change before or during examination of the Local Plan Review.

3.2.3 The DNP should be sufficiently aligned with flexibility to ensure that conflicts are minimised with the strategic policies of the emerging Local Plan to ensure that the

DNP is capable of being effective over the duration of its plan period and not ultimately superseded by s38(5) of the Planning and Compulsory Purchase Act 2004.

4 DANBURY NEIGHBOURHOOD PLAN

4.1.1 This section is in response to the DNP consultation document and its supporting evidence base.

4.2 Vision and Objectives

4.2.1 Gladman broadly support the vision and objectives of the DNP, particularly with the plan's aspiration to accommodate sympathetic, sustainable development. Gladman support the objective to provide high-quality housing provision in the village and note that many of the other objectives can be met or complimented by sustainable residential development. For example, the provision and support of sustainable transport options, new residents to support local businesses, and contributions to local healthcare and education facilities. The contribution residential development can make should not be overlooked.

4.3 Policy DNP1: Housing Site Allocations

4.3.1 This policy sets out the sites that will be allocated to deliver 93 dwellings, with further dwellings expected through windfall development. Gladman question the likelihood of this when the plan is currently proposing to allocate what would normally be considered to be windfall opportunities to make up the 93-dwelling figure.

4.3.2 Recognising that the development quantum was established in light of development constraints around the settlement, a village the size of Danbury would otherwise be expected to deliver a housing level in excess of this figure. As such Gladman suggest that the neighbourhood plan should strive to meet the 100-dwelling target as a minimum and potentially even allocate in excess of this figure.

4.3.3 In this regard, Gladman raise concerns with the process undertaken in selecting sites. Land Gladman are promoting at Maldon Road (Site D4) was discounted early in the process despite having similar development constraints to other sites ultimately allocated (Sites D5 and D7). Gladman support the principle of allocation of site D5 and consider that the allocation of this site shows that Site D4 merited further consideration.

4.3.4 Landscape, ecological and heritage impacts also apply to Sites D5 and D7, yet a level of flexibility is afforded to these sites through policy wording that was not afforded to the assessment of Site D4.

4.3.5 Latest assessment of the site by the City Council scores the site as 'Amber' and worthy of further consideration, it is not clear why this approach has equally not been taken through the DNP. This point in particular is returned to in relation to the SEA supporting the plan.

4.4 Policy DNP2: Housing Type, Mix and Tenure

4.4.1 In principle, Gladman support Policy DNP2 which seeks to deliver a range of housing types and sizes to meet the local communities housing needs. However, it is important to note that evidence supporting this policy only provides an assessment of need at a single point in time and will be subject to change over the duration of the plan period. It is important that this policy promotes a flexible strategy to ensure a choice of housing options are available to residents over the course of the plan period. The policy should therefore be modified so that it allows consideration of the most up-to-date evidence on housing need available.

4.5 Policy DNP6: Environment and Biodiversity

4.5.1 Gladman are supportive of this policy which is in line with national guidance. However, there is no need to duplicate national and local planning policy within a neighbourhood plan.

4.6 Policy DNP14: Danbury Key Views (Figure 7)

4.6.1 Gladman are concerned that the proposed policy will seek to prejudice the delivery of sustainable development proposals from coming forward. The emphasis of this policy is on the 'protection' of the landscape of the surrounding area rather than seeking to integrate new sustainable development opportunities within the existing landscape and character of the local area. Furthermore, to be valued, a view would need to have some form of physical attributes demonstrating its significance. The

policy must allow for a decision maker to come to a view as to whether particular locations contain physical attribute that would 'take it out of the ordinary' rather than designating vast swathes of land which may not have any landscape significance and are based solely on community support. Opinions on landscape are highly subjective therefore without robust evidence to demonstrate why these areas are considered special beyond the fact that they are 'an area of attractive and unspoilt countryside' Gladman recommend that this policy is deleted.

- 4.6.2 If the policy is to be retained, Gladman suggest that View 3 is removed for the reasons stated above. The evidence base to support the policy does little to indicate why a panoramic view should be protected from Runsell Lane, other than providing a nice view of the surrounding fields. Gladman submit that development could come forward to the south of Runsell Lane without causing significant adverse impact on the setting of Danbury and there is insufficient evidence to support the protection the view within this plan. Gladman therefore suggest this element of the policy is deleted.

5 STRATEGIC ENVIRONMENT ASSESSMENT/SUSTAINABILITY APPRAISAL

5.1 Context

- 5.1.1** The preparation of neighbourhood plans may fall under the scope of the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations) that require a Strategic Environmental Assessment (SEA) to be undertaken where a Plan's proposals would be likely to have significant environmental effects.
- 5.1.2** The SEA is a systematic process that should be undertaken at each stage of a Plan's preparation. It should assess the effects of a neighbourhood plan's proposals and whether they would be likely to have significant environmental effects and whether the Plan is capable of achieving the delivery of sustainable development when judged against all reasonable alternatives.
- 5.1.3** Both the SEA Directive and Neighbourhood Planning PPG make expressly clear that an SEA Screening Assessment should be undertaken at the earliest opportunity¹. Gladman approve of the decision to undertake an SEA to support the current consultation. However, Gladman consider that the assessment has not fully assessed the reasonable alternatives in sufficient detail and therefore fails to meet basic condition (f).
- 5.1.4** Gladman consider that land at Maldon Road, Danbury (assessed as Site D4 in neighbourhood plan documentation) has been discounted too early in the plan making process and should have been considered as a reasonable alternative. As set out in response to Policy DNP1, latest assessment of the site by the City Council scores the site as 'Amber' and worthy of further consideration, it is not clear why this approach has equally not been taken through the DNP.

¹ PPG Paragraph 029 Reference ID: 11-029-20150209

6 SITE SUBMISSION

6.1 Land at Maldon Road, Danbury

6.1.1 Gladman are promoting land to the East of Danbury. The full site extends to 6.71 hectares and is made of a single agricultural field. The site is bound by Maldon Road to the South and Runsell Lane on the north and east boundaries. The development of the site could provide the 90 dwellings, along with policy compliant level of affordable housing, currently 35%.

6.1.2 As well as promoting the Site through the neighbourhood plan, Gladman are promoting the site through the emerging Local Plan Review.

Site Assessment

6.1.3 The initial site assessment undertaken in April 2019 found the site to be unsuitable as the site has significant constraints. The key reasons are set out as the site is adjacent to a designated heritage asset and is of high landscape sensitivity. There is also some impact expected on the SSSI around the settlement, but a high RAG assessment is used to determine that the site would have an expected greater impact than some of the sites proposed for allocation.

6.1.4 The updated site assessment in March 2020 assessed an amended boundary and came to the same conclusion as the 2019 assessment. In reaching both these conclusions Gladman suggest that insufficient regard has been paid to potential mitigation measures such as enhanced landscaping or a wider management plan to limit impacts on the SSSI. Mitigation measures that are afforded to sites ultimately allocated in the plan, yet as they weren't considered did not even make it through to be assessed through the SEA. Gladman consider this to be a significant failing of the site assessment process undertaken.

7 CONCLUSIONS

7.1 Summary

7.1.1 Gladman welcomes the opportunity to comment on the Regulation 16 Consultation currently being considered. These representations have been drafted with reference to the revised National Planning Policy Framework (NPPF2023) and the associated updates that were made to Planning Practice Guidance.

7.1.2 Gladman have provided comments on a number of the issues that have been identified in the consultation material.

7.1.3 Gladman consider that the site we are promoting should have been considered through the SEA process and is clearly capable of allocation through the neighbourhood plan.

7.1.4 If the examiner deems a hearing is required as part of the examination of the neighbourhood plan, Gladman kindly request to be invited to participate.



Comment

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Company / Organisation
Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation
Comment by Medical Services Danbury (- 1330259)
Comment ID DNP-131
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Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below General

Question 2

Please add your comments below

Please see attachment and Appendices A, B and C

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

If you wish to submit any supporting information, please upload it here [DNP-131 Medical Services Danbury - Attachment.pdf](#)

If you wish to submit any supporting information, please upload it here [DNP-131 Medical Services Danbury - Appendix A.pdf](#)

If you wish to submit any supporting information, please upload it here [DNP-131 Medical Services Danbury - Appendix B.pdf](#)

If you wish to submit any supporting information, please upload it here [DNP-131 Medical Services Danbury - Appendix C.pdf](#)

Neighbourhood Plan Representation

Danbury Neighbourhood Plan
Submission (Regulation 15) Version

Planning Statement

Danbury Neighbourhood Plan Pre-Submission (Regulation 15)



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Appendix A – Regulation 14 representations

Appendix B – Built Heritage Assessment

Appendix C – Chelmsford City Council Strategic Housing Needs Assessment Final Report (October 2023)



1. Introduction, Background and Overview

- 1.1 This representation on the Danbury Neighbourhood Plan Submission (Regulation 15) Version ('the draft DNP') has been prepared by Savills (UK) Ltd on behalf of Medical Services Danbury Ltd (MSD).

Overview

- 1.2 In order for a Neighbourhood Plan to proceed to referendum it is required to meet the 'Basic Conditions' as prescribed in Paragraph 8(2) of Schedule 4B to the Town & Country Planning Act 1990. In our view, and for the reasons detailed in this representation, the draft DNP in its current form does **not** meet these Basic Conditions.
- 1.3 Representation were made on the previous, Regulation 14, consultation iteration of the DNP on behalf of MSD. A copy of which is re-provided as **Appendix A** to this representation. A number of concerns were raised within this previous representation, including those pertaining to the ability of the draft as then proposed to meet the Basic Conditions. Suggestions were made as to how the Regulation 14 DNP could be amended such that it met the Basic Conditions. MSD offered to meet with the Neighbourhood Plan Steering Group to discuss these concerns on multiple occasions, without a positive response.
- 1.4 It is disappointing that not only did the Neighbourhood Plan Steering Group not accept the invitation from MSD to meet to discuss concerns raised within the Regulation 14 representation, but that few of the issues cited have been addressed in the Regulation 15 iteration of the DNP.

Background

- 1.5 MSD own land at Bay Meadow, adjacent to Danbury Medical Centre ('the Site').
- 1.6 The Site is being promoted by the owners for residential development. Specialist accommodation (including care uses), with potential for Class E commercial use also has been previously proposed. However, MSD is willing to take a flexible approach in terms of the nature of any residential development of the Site, along with scale.
- 1.7 The Site was assessed through the Neighbourhood Plan making process as site D12.
- 1.8 The draft DNP does not propose allocation of the Site.
- 1.9 The purported justification for this is set out within Section 2 of the Danbury Neighbourhood Plan Site Selection and Allocation Report. This references the Site Options and Assessment Report (2021), which forms part of



the draft DNP evidence base, and its conclusion that the Site is unsuitable for residential development. This is contrary to the findings of earlier iterations of the Site Options and Assessment Report, with both the 2019 and 2020 versions finding the site to be potentially suitable. The reason for the Site Options and Assessment Report (2021) coming to a different conclusion in respect of the Site's suitability appears to be based on comments received from Chelmsford City Council's Principal Heritage Officer in March 2020, which are provided as supporting evidence document 23a to the draft DNP.

- 1.10 The above were considered through MSD's response to consultation on the Regulation draft DNP, a copy of which is provided again as Appendix A.
- 1.11 This representation is accompanied by a Built Heritage Assessment that was prepared by specialist heritage consultants, and which accompanied representations made at the Regulation 14 stage. It is re-provided here as **Appendix B**.



2. Basic Conditions

- 2.1 This section provides an overview of the Basic Conditions the DNP will be required to meet if it is to successfully progress through examination and on to referendum.
- 2.2 The Basic Conditions are set out within paragraph 8(2) of Schedule 4B to the Town & Country Planning Act 1990, and are as follows:
- a) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order;
 - b) having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order;
 - c) having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order;
 - d) the making of the order contributes to the achievement of sustainable development;
 - e) the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);
 - f) the making of the order does not breach, and is otherwise compatible with, EU obligations; and prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order.
- 2.3 Of the above, b) and c) only apply to the consideration of Neighbourhood Development Orders, and not to Neighbourhood Plans.
- 2.4 The issues considered of particular relevance to consideration of the draft DNP pertain to national policy and guidance, and whether the draft DNP is contrary to these (Basic Condition a)); whether the draft DNP contributes to achieving sustainable development (Basic Condition b)); and the draft DNP (including the accompanying Strategic Environment Assessment)'s compliance with 2001/42/EC ('the SEA Directive'), the plan-making aspects of which are transposed into UK law through the Environmental Assessment of Plans and Programmes Regulations 2004 (Statutory Instrument 2004 No.1633) ('the SEA Regulations') (Basic Condition f).

3. Basic Condition A

3.1 The draft DNP is not considered to meet this Basic Condition. It is considered contrary to various elements of national policy, including in relation to its approach to:

- Meeting development needs;
- Justification of proposed policies; and
- Conserving and enhancing the historic environment.

3.2 The above are considered in turn, below.

Meeting development Needs

3.3 The NPPF makes clear that meeting development needs is a fundamental aspect of achieving sustainable development. At paragraph 11a), under the heading 'The presumption in favour of sustainable development', it states that sustainable development for plan-making means promoting sustainable patterns of growth which *inter alia* meet development needs.

3.4 The National Planning Policy Framework (NPPF) places a great emphasis on meeting development needs, and housing needs in particular.

3.5 Paragraph 60 of the NPPF sets out a clear call for planning to boost housing land supply, stating:

“To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. The overall aim should be to meet as much of an area’s identified housing need as possible, including with an appropriate mix of housing types for the local community”.

3.6 In respect of development needs relating to the provision of housing, the NPPF requires strategic policies to be informed by local housing need assessments, utilising the Standard Method as set out in the Planning Practice Guidance, unless exceptional circumstances justify an alternative approach.

3.7 Notably, current relevant strategic policies (in the Chelmsford Local Plan 2020) were prepared and examined under the NPPF’s transitional arrangements, i.e. the NPPF 2012 and an alternative approach to calculating housing need which did not utilise the Standard Method.

3.8 Using such an alternative approach (as of course a Local Plan being prepared under the NPPF transitional arrangements was entitled to do) the Local Plan was predicated on meeting an objectively assessed housing



need of objectively assessed housing need for Chelmsford of 805 dwellings per annum (dpa). However, Chelmsford City Council now rightly acknowledges that its latest calculation of housing need equates to a minimum of 955dpa¹. This represents a 19% uplift in local housing need from that used to inform the current Development Plan. Chelmsford City Council currently proposes a housing requirement of 1,000dpa be used for its new Local Plan².

- 3.9 It is also pertinent to note that since adoption of the current Local Plan, Chelmsford City Council has declared a Housing Crisis. In February 2022 the Council voted to declare a Housing Crisis with issues identified including the significant increase in housing costs in Chelmsford, and the large number of homeless households.
- 3.10 Furthermore, a Strategic Housing Needs Assessment has been prepared for Chelmsford City Council (a copy of which is provided as **Appendix C** to this representation) ('the SHNA').
- 3.11 The SHNA identified an initial net need for 623 additional social / affordable rent homes per annum across the administrative area, which it lately refined to a net need of 463 social / affordable rent dwellings per annum once those already in housing had been accounted for.
- 3.12 Such an affordable housing need will be incredibly challenging to deliver, even if an overall housing requirement of 1,000dpa were to be set.
- 3.13 The calculation of affordable housing need does not include shared ownership or other forms of affordable home ownership. Given that current national policy require at least 25% of new affordable homes to be provided as First Homes, meeting the need for social / affordable rent homes in the borough becomes more challenging still.
- 3.14 Having regard to the above, the housing needs position of the borough is evidently more acute than at the time current strategic policies were adopted. The current adopted housing requirement was predicated on a figure which is now manifestly out-of-date, and the City Council is reviewing this through the preparation of a new Local Plan.
- 3.15 In terms of the relevance of this insofar as concerns the draft DNP and whether it is appropriate having regard to national policy and guidance, the Planning Practice Guidance (PPG) explains how Neighbourhood

¹ At paragraph 6.4 of the Chelmsford Local Plan Preferred Options 2024

² At paragraph 6.6 of the Chelmsford Local Plan Preferred Options 2024

Planning Statement

Danbury Neighbourhood Plan Pre-Submission (Regulation 15)



Plans should approach the issue of meeting development needs.

3.16 .The PPG states that:

*“Neighbourhood plans are not obliged to contain policies addressing all types of development. However, where they do contain policies relevant to housing supply, these policies should take account of **latest and up-to-date evidence** of housing need”.* (Paragraph: 040 Reference ID: 41-040-20160211. Emphasis added).

3.17 As noted above, the City Council is preparing a new Local Plan, and there is an inherent risk it could render the DNP out-of-date. The PPG explains how the potential for this to occur should be reduced, repeating the need to account for the latest and most up-to-date position on housing need:

*“To reduce the likelihood of a neighbourhood plan becoming out of date once a new local plan (or spatial development strategy) is adopted, communities preparing a neighbourhood plan should take account of **latest and up-to-date evidence** of housing need, as set out in guidance on preparing a neighbourhood plan or Order.* (Paragraph: 084 Reference ID: 41-084-20190509. Emphasis added).

And:

*“Neighbourhood planning bodies are encouraged to plan to meet their housing requirement, and where possible to **exceed** it. A sustainable choice of sites to accommodate housing will provide **flexibility if circumstances change**, and allows plans to remain **up to date** over a longer time scale”.* (PPG Paragraph: 103 Reference ID: 41-103-20190509)

3.18 In terms of accounting for the latest and up-to-date evidence of housing need, we have not been able to find any reference to the SHNA assessment within the draft DNP, let alone any evidence that it has been accounted for.

3.19 On the contrary, the draft DNP only appears to make provision for 93 homes. The current Development Plan (as per above, based on an outdated approach to determining housing need and not accounting for latest evidence suggesting a much greater housing need for the borough) directs ‘around’ 100 dwellings to Danbury, to be allocated through the DNP. The Strategic Environmental Assessment that accompanies the DNP suggests (paragraph 9.6) that a 10% ‘flexibility bracket’ can be applied in order to interpret reference to ‘around’ 100 dwellings. As such, even if one were to ignore the PPG’s call for the latest and up-to-date evidence of housing need to be accounted for, the approach of planning to deliver towards the lower end of the ‘flexibility bracket’ in relation to the number of new homes directed to the Parish by the Development Plan is patently at odds with national policy and its exhortation to boost housing land supply.

3.20 Having regard to the above, the draft DNP is considered to be contrary to national planning policy and

guidance on the approach to meeting development needs, specifically housing needs.

Justification of proposed policies

3.21 The NPPF confirms the need for robust and proportionate evidence to be prepared which justifies the proposed plan. At paragraph 31 it states:

“The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals”.

3.22 The PPG further emphasises the need for Neighbourhood Plans, specifically, to be based on appropriate evidence, stating:

*“A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and **supported by appropriate evidence**. (Paragraph: 041 Reference ID: 41-041-20140306. Emphasis added)”.*

3.23 The PPG also states:

“Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan or the proposals in an Order.” (Paragraph: 040 Reference ID: 41-040-20160211).

3.24 In respect of the issue of allocating sites for housing, the PPG also stresses the need for allocations to be justified. Firstly it explains that:

“A neighbourhood plan can allocate sites for development, including housing. A qualifying body should carry out an appraisal of options and an assessment of individual sites against clearly identified criteria. Guidance on assessing sites and on viability is available” (Paragraph: 042 Reference ID: 41-042-20170728).

3.25 Further to the above, the guidance to which qualifying bodies are pointed includes the following states assessment of sites should include *inter alia* “where these have been discounted, evidence justifying reasons given.” (PPG Paragraph: 026 Reference ID: 3-026-2019072).

3.26 The rejection of the Site as a potential residential allocation in the DNP is not supported by robust or the most up-to-date evidence, as required by national policy and guidance.

3.27 In the Consultation Statement which accompanies the draft DNP, in response to the questioning of the

evidence to support the rejection of the Site, it is confirmed that:

“The evidence is contained in the Chelmsford Local Plan Heritage Assessments – Technical Note Addendum 2 – Danbury, prepared to support the Danbury Neighbourhood Plan and part of the evidence base. Paragraph 2.5 sets out that the harm through developing the site could not be adequately mitigated”.

3.28 Chelmsford Local Plan Heritage Assessments – Technical Note Addendum 2 – Danbury (‘Heritage Technical Note’) is dated April 2019, and was an addendum to a Technical Note produced in 2017.

3.29 As an initial point, any reliance on the Heritage Technical Note to justify exclusion of any site through the plan-making process would be troubling. The Heritage Technical Note itself did not purport to provide absolute justification for the rejection of sites from consideration for development, stating:

“This report will inform future development options, which will be subject to assessment of a whole range of other constraints and opportunities in terms of development site allocation and delivery”

3.30 Looking further at the Heritage Technical Note, the Site and its wider area (including land adjoining it to the east) was considered as site reference Site F. The entirety of the assessment of Site F within this note is as follows:

“This site has recently been developed as Danbury Medical Centre. The open pastoral character of this piece of land, known as Dawsons Field, is important to the character of this part of the Conservation Area and as a buffer from the modern development to the east. The medical centre was justified on the basis the design and siting to limit its impact and for the public benefits it delivered. Further development on this site would be harmful to the Danbury Conservation Area”. (Paragraph 12.14).

3.31 Separately, the Site itself is also discussed, at paragraph 2.5 of the Heritage Technical Note as Site D12. The entirety of the assessment of Site D12 within the Technical Note comprises the following:

“This was subject to a recent planning appeal for a care home, dismissed on the basis of the harm to the Conservation Area and the setting of the adjacent listed building. Previously, development of the eastern part of the site for the Danbury Medical Centre was justified on the basis of its design and the public benefits it delivered through provision of an essential healthcare facility. This western part of ‘Dawsons Field’ has a rural pastoral character, which provides a buffer between the historic core of the village and its modern expansion to the east. Its open character is an important feature within the Conservation Area. The harm through developing the site could not be adequately mitigated.”

3.32 The assessment of the Site in heritage terms, within the document relied upon to justify the Site’s exclusion, is very much limited. It asserts that the Site’s open character is an important feature of the Conservation

Area, but does not appear to explain why.

- 3.33 Whilst it is acknowledged that an application was refused for a proposed development on the Site, this was in relation to a specific scheme, of a specific size and scale, and determined in accordance with the Development Plan and national policy that was in place at the time. The determination of a planning application for a specific proposed development is a very different exercise to the consideration of a site for allocation through the plan-making process; and the two processes should not be conflated.
- 3.34 Separately, a Built Heritage Assessment was prepared by RPS and submitted in response to consultation on the Regulation 14 draft DNP (March 2023).
- 3.35 This Built Heritage Assessment is site-specific, and as such considers the Site in significantly greater detail. This site-specific appraisal flows from a review of the planning policy and historical context of the Conservation Area, as well as an assessment of the significance of the Site.
- 3.36 As such, this Built Heritage Assessment takes a fundamentally different approach to considering the Site and the potential impact of its development on the significance of heritage assets. It is considered far more robust a piece of evidence insofar as decisions regarding the Site is considered than the Heritage Technical Note relied upon to justify rejection of the Site in the draft DNP.
- 3.37 Further to the analysis undertaken by the Built Heritage Assessment it concludes that:
- The Site makes a neutral contribution only to this section of the DCA and the DCA overall;
 - Development introduced into the Site would cause no harm to either the DCA or the statutorily listed buildings if the recommendations outlined are carefully incorporated into design and materials;
 - The Site could make an extremely positive contribution to supporting the village community and its growing population;
 - Provision for public access to the Site, potentially in the form of a green space, would allow this neglected space to be appreciated.
- 3.38 Despite the Built Heritage Assessment having been submitted as part of MSD's response to consultation on the Regulation 14 draft DNP, it is far from clear how its findings have been accounted for. There does not appear to have been any comparative assessment undertaken by the Parish or City Council, or anything prepared that seeks to challenge its conclusions. The approach instead appears to be to simply rely on a far less detailed Technical Note.
- 3.39 The approach of discounting provision of robust, up-to-date evidence in favour of older, less detailed evidence is very problematic



3.40 As set out in our response to the Regulation 14 draft DNP, there are similarities between issues with the draft DNP and those that resulted in the Oundle Neighbourhood Plan being found to have failed the Basic Conditions, with one of the issues identified being the failure to ensure it was supported by robust evidence justifying the spatial strategy and site selection process.

3.41 We consider that the draft DNP cannot be considered to be justified in its rejection of the Site, and is clearly contrary to national policy and guidance which makes clear the importance of decisions – including regarding the rejection and selection of sites – being justified and based on evidence.

Conserving and enhancing the historic environment

3.42 The Site is located within the Danbury Conservation Area. However, simply being within a Conservation Area does not render a site unsuitable for development. On the contrary, the NPPF calls for planning to set out a positive strategy for the conservation and enjoyment of the historic environment which takes account of *inter alia* “the desirability of new development making a positive contribution to local character and distinctiveness.” (Paragraph 196c)).

3.43 Furthermore, at paragraph 212 the NPPF expressly calls for Local Planning Authorities to look for opportunities for new development within Conservation Areas to enhance or better reveal their significance.

3.44 The Built Heritage Assessment found that the Site makes a neutral contribution to the Conservation Area, noting that :

- *“There is no awareness of this area of land at all, unless one is visiting the Medical Centre. This applies whether one is walking past the Site along the Maldon Road east-west/west-east or along Gay Bowers and Mill Lanes respectively;*
- *“When at the Medical Centre it is evident that the visitor generally enters and leaves the centre by car, focusing on arrival, departure and the centre itself, not the appreciation of this enclosed open space;*
- *“Historically, the Site was parish land with historic maps evidencing that it was barely enclosed with vegetation. At this time, the Site could be said to be more appreciable and accessible to the village; this is not the case today - the Site is private land and cannot be entered by the public”.*

3.45 The above suggests that there may well be opportunities to enhance or better reveal the significance of the Danbury Conservation Area. However, the draft DNP does not appear to have considered this. Not only is the draft DNP’s rejection of the Site on the basis of heritage concerns misplaced, rendering the draft DNP unjustified; but the overlooking of an opportunity to better reveal or enhance the significance of the Danbury Conservation Area is also contrary to national policy.



Planning History

- 3.46 The Site was subject of a planning application for construction of a 72-bed care home, together with 22 car parking spaces and landscaping (reference 16/01770/FUL). The application sought permission in full, with no matters reserved.
- 3.47 The application was refused 22 December 2016, and an appeal dismissed on 15 January 2018.
- 3.48 In brief, the appeal was dismissed due to the Site being located outside of the settlement boundary (and the proposed development not being a form of development allowed in rural areas beyond the Green Belt); harm to the Danbury Conservation Area and setting of a listed building; and harm to biodiversity of the proposed development.
- 3.49 In terms of the relevance of this appeal to the draft DNP and its decisions regarding allocations, it is important to recognise that consideration of a detailed appeal scheme for a very specific form of development is fundamentally different to considering an allocation in the preparation of a new or update of a Local Plan or Neighbourhood Plan. The former is considered in the context of the then Development Plan, whereas the latter entails changing the Development Plan. Importantly, it was a detailed development proposal that was considered through the appeal, rather than merely the development of the Site in principle. Whilst harms identified relate to issues that need to be addressed through any alternative proposal for the Site, conclusions reached through the appeal in respect of impact on designated heritage assets and ecology were done so in respect of a detailed scheme that was before the Inspector. They are not issues that should result in the Site being considered unsuitable for *any* form of development, and conclusions reached solely on the basis of the outcome of this appeal would be unjustified.

The Site and its Proposed Development

- 3.50 The Site is currently in private ownership, with no public access.
- 3.51 The Site lies outside of, but adjoining, the defined settlement boundary as per the current Development Plan. It is not subject to any significant environmental, ecological or landscape constraints that suggest it would be fundamentally unsuitable for development.
- 3.52 The Site is greenfield but is not in agricultural use. In addition, it could not be said to have a strong relationship to open countryside to the south. Instead, it is a well contained site, the character of which is influenced by adjacent development which relates well to the established pattern of development in Danbury. Development of this land would complement the existing pattern of development in Danbury, and would not risk any encroachment into the wider countryside.



- 3.53 It is within Flood Zone 1 – land least at risk of flooding from tidal or fluvial sources.
- 3.54 It is located within the Danbury Conservation Area. However, this does not represent an absolute constraint to development. On the contrary, the NPPF is clear that planning should look for opportunities for new development within Conservation Areas to enhance or better reveal their significance.
- 3.55 As discussed, the Site has been subject to a detailed assessment of its contribution to the significance of heritage assets, including the Conservation Area, as well as their setting (the Built Heritage Assessment provided as Appendix B to this representation).
- 3.56 As noted in paragraph 3.44 of this representation, following detailed assessment, the Built Heritage Assessment concludes the Site makes only a neutral contribution to the Danbury Conservation Area.
- 3.57 As discussed further in Section 4 of this representation, the Site is centrally located within Danbury and existing services and facilities would be readily accessible to future residents without reliance on the private car.
- 3.58 The Site is deliverable and would help contribute to a sustainable pattern of development for Danbury.
- 3.59 The Site is available and achievable for a development of c.25 dwellings, and can also accommodate some specialist housing, including potentially accommodation with elements of care / care home.
- 3.60 Alternatively, the Site should also be considered available and achievable for Class E commercial development.
- 3.61 The landowner is willing to take a flexible approach to the development of the Site. We would welcome further discussions with the Neighbourhood Plan Steering Group as to what development would best help meet the needs of the community, including potential open space provision as part of a development.

Assessment of the Site through DNP

- 3.62 There have been three iterations of the Site Options and Assessment Report that informs the DNP: 2019, 2020, and 2021 reports.
- 3.63 The Site Options and Assessment Report 2019 assessed the Site (as site D12) and concluded that it was one of nine that were potentially suitable for residential development, subject to mitigation. The assessment included acknowledgement that the Site was within a Conservation Area.
- 3.64 The Site Options and Assessment Report 2020 similarly concluded that the Site was potentially suitable for residential development.



3.65 However, the Site Options and Assessment Report 2021 represented a change in position, concluding the Site was unsuitable. The site assessment conclusions implied that the determinant factor in this conclusion was new heritage advice received from a Chelmsford City Council Heritage Officer. Reference is made to an email received from an officer in March 2020. The Site Options and Assessment Report 2021 states:

“the entirety of the site should now be ruled out for development as no development would be possible without causing harm to the conservation area and setting of the listed building.”

3.66 Separately, the key documents published alongside the draft DNP includes the Chelmsford Local Plan Heritage Assessments, Technical Note, March 17 and Addendum 2 – for Danbury, April 2019 (document reference 23a). In respect of the Site, this references the appeal for a care home and concludes *inter alia* that the site:

“provides a buffer between the historic core of the village and its modern expansion to the east. Its open character is an important feature within the Conservation Area. The harm through developing the site could not be adequately mitigated”.

3.67 Another document which supports the draft DNP is the Chelmsford City Council Heritage and Conservation Officer advice, March 2020 (document reference 23b). This comprises an email from a Chelmsford City Council Heritage Officer. In respect of the Site it states, in full:

“This site is within the Danbury Conservation Area and is adjacent to a group of listed buildings. The site forms part of [a] significant open space. Development here was considered at the appeal for a care home. Any development here would be harmful to the designated heritage assets, which is a matter of great weight. Even if the site were used for single storey almshouses this would not adequately mitigate the adverse heritage impacts.”

3.68 The assessment of the Site appears to be very limited, and appears to rely on the appeal decision in respect of a specific scheme for a greater quantum of development than now proposed. We have not been able to identify any detailed assessment of the Site’s significance to heritage assets or to the setting of heritage assets that has informed these views. From the evidence we have been able to identify, the conclusions in respect of the Site being fundamentally unsuitable for *any* development from a heritage perspective do not appear to have been reached on an evidential basis. It would be wholly unjustified for the DNP to proceed on the basis of such conclusions.

- 3.69 The lack of an evidential basis for rejecting the Site renders the draft DNP unjustified and contrary to national policy. In terms of the specific reasons for rejecting the Site, it also means that DNP has failed to plan positively in respect of heritage assets, to consider their significance, and look at opportunities to enhance the Conservation Area. Again, this is contrary to the NPPF.
- 3.70 There are parallels with issues in respect of the preparation of the Oundle Neighbourhood Plan. In December 2019, this Neighbourhood Plan was found to have failed the Basic Conditions, with one of the issues identified being was the failure to ensure it was supported by robust evidence justifying the spatial strategy and site selection process.
- 3.71 Separately, we note the draft DNP is supported by a Strategic Environmental Assessment (SEA), with the SEA Environmental Report July 2022 forming part of the evidence base. As noted within Section 2, and discussed further in Section 5, where SEA is required of a Neighbourhood Plan, the plan and SEA must comply with the SEA Regulations. As discussed in more detail in Section 5, such regulations include the requirement to identify, describe, and evaluate the likely significant effects on the environment of not just the proposed options, but also reasonable alternatives.
- 3.72 The SEA Environmental Report does not consider the Site to be a potential allocation meriting assessment through the SEA, reporting at paragraph 5.9 that it had been found unsuitable for allocation. From paragraph 5.8, it appears the basis for considering site D12 to be unsuitable is the findings of the Site Options and Assessment Report 2021. However, for the reasons noted above, this is not considered to represent a robust assessment of the Site sufficient to justify its rejection.
- 3.73 As confirmed in the *Stonegate*³ judgment in relation to the Henfield Neighbourhood Plan, it is important that the reasons for rejection of options are based on robust evidence. Failure to ensure the Neighbourhood Plan is adequate can result in a Neighbourhood Plan being quashed by the High Court, as was the case in *Stonegate*. The judgment in *Stonegate* included the following:
- “The reason for rejecting [an option] is flawed based as it is upon an inadequate, if that, evidence base. The requirement, under the Directive, that the alternatives are assessed in a comparable manner and on an accurate basis was simply not met”* (Paragraph 74)
- 3.74 A detailed heritage assessment has been undertaken in respect of the Site now, and submitted alongside this representation. We consider it essential that its findings are given due consideration in the plan-making process. To ignore this evidence would be to make a similar mistake to that which was made in the preparation of the Henfield Neighbourhood Plan, where an option was rejected on the basis of perceived adverse impact relating to highways, despite evidence to the contrary.



3.75 As per the conclusions of the Built Heritage Assessment, the Site can be developed in a manner that would not harm the Conservation Area or other heritage assets. Given the other characteristics of the Site as discussed above, it therefore clearly represents an opportunity to deliver a highly sustainable development that addresses a specific need through accommodation located centrally within the village. Failure to reconsider the Site's potential allocation would be to overlook an opportunity to help facilitate sustainable development.

3.76 The above concerns can be addressed through amendments to the draft DNP, including revisiting the site assessment and SEA work undertaken to date with the benefit of the findings of the Built Heritage Assessment.

Draft DNP and Ensuring Specialist Housing Needs are Met

3.77 As noted in Section 2, the NPPF requires plans to not only meet housing needs in general terms, but to consider the housing needs of all parts of the community, including the needs of older people and of those with disabilities.

3.78 The Danbury Housing Needs Assessment which forms part of the evidence base of the draft DNP makes a number of references to Danbury having an ageing population, but does not go on to suggest what this might mean in terms of specialist accommodation needs.

3.79 Furthermore, the draft DNP itself does not appear to contain any policies that expressly address the accommodation needs of older people / people who may need care / people who may wish to downsize / age appropriate housing in general. This is despite acknowledging at paragraph 2.28 that the Parish's population is ageing.

3.80 The absence of policies to address specialist housing is particularly problematic given that the adopted Chelmsford Local Plan does not address this issue in a manner required by current national policy – again it should be recognised that the Chelmsford Local Plan was prepared and examined in relation to the 2012 NPPF, i.e. prior to the introduction into national policy of the exhortation to address the housing needs of the different sections of the community, including older people. Indeed, the Chelmsford Local Plan's only policy (DM1) that includes encouragement to provide specialist accommodation only applies to developments of more than 100 dwellings.

3.81 As such, it would not apply to any of the allocations currently proposed by the draft DNP. In any case, Policy DM1 does not require a specific proportion or quantum of specialist accommodation. Consequently, unless the draft DNP is updated to address this issue, there would be nothing in the Development Plan to help ensure that the accommodation needs of all of the community in Danbury are addressed, contrary to the NPPF.

³ *Stonegate Homes Ltd v Horsham DC* [2016] EWHC 2512

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3.82 We consider the draft DNP's failure to address the accommodation needs of older people to be a significant deficiency in the current iteration of the plan, one which renders it contrary to the NPPF and undermines its ability to achieve sustainable development (particularly in relation to the social dimension of sustainable development).

3.83 This is a flaw however that can be cured, and the Site represents a sustainable one that is available for allocation to help do so.



4. Basic Condition D

- 4.1 Basic Condition d) requires that the DNP contributes to the achievement of sustainable development.
- 4.2 There is a degree of overlap between matters raised in respect of Basic Condition a) and the issue of contributing to the achievement of sustainable development, particularly in relation to meeting development needs. As the NPPF makes clear, meeting development needs is an important component of sustainable development
- 4.3 Consequently, not only does the draft DNP's failure to draw upon the latest evidence on housing need render it contrary to national policy and Basic Condition a), it also gives rise to concerns regarding meeting Basic Condition d).
- 4.4 Separately, for the reasons set out in MSD's response to the Regulation 14 draft DNP, the Site is considered to represent a highly sustainable one for residential development. The factors that weigh in favour of the Site's residential allocation are set out in paragraphs 3.1 to 3.14 of the Regulation 14 draft DNP consultation response.
- 4.5 Even if one were to accept the draft DNP's criticisms of the Site from a heritage perspective (criticisms which are not accepted, for the reasons set out in Section 3 of this response) there appears to have been no attempt to weigh the purported harms against the numerous and significant benefits of the residential development of the Site, many of which should be afforded substantial weight.
- 4.6 Such factors include the Site's highly accessible location, located within walking distance of a number of services and facilities. Not only does this proximity help reduce future residents' reliance on the use of the private car (with environmental and social benefits); but also assists in supporting such services and facilities, helping to ensure they can be sustained, with resultant benefits to the wider community. Additionally, the Site is well-placed in relation to public transport opportunities that provide access to other neighbouring centres, including Maldon and Chelmsford. Furthermore, it is pertinent to note that future residents of the Site would benefit from the vast areas of publicly accessible green space and recreational space that is located around Danbury, but which development of the Site would not entail any loss.
- 4.7 Whilst the Site is greenfield it is not in agricultural use, and neither does it have any recreational or leisure value. It represents a very much underutilised, sustainable site, located in the close proximity to the centre of Danbury. The draft DNP's failure to explore options for the Site's development results in an inefficient use of land within Danbury, and is contrary to sustainable development.
- 4.8 It is also considered that the draft DNP cannot be considered in isolation, but also within the context of the

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wider administrative area of Chelmsford City. As the Chelmsford Local Plan Preferred Options confirms, in order to meet development needs, more greenfield land beyond established settlement boundaries will be required to be released in order to meet development needs. In this context, it is particularly important in achieving sustainable development to properly explore options for sites such as the Site, rather than reject these based on flawed reasoning.



5. Basic Condition F

- 5.1 Basic Condition f) requires that the making of the order does not breach, and is otherwise compatible with, EU obligations; and prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order.
- 5.2 Such obligations include those within the 2001/42/EC ('the SEA Directive').
- 5.3 The plan-making aspects of the SEA Directive are transposed into UK law through the Environmental Assessment of Plans and Programmes Regulations 2004 (Statutory Instrument 2004 No.1633) ('the SEA Regulations').
- 5.4 Strategic Environmental Assessment (SEA) is not required for all Neighbourhood Plans. However, within the SEA Environmental Report it is confirmed that the DNP was subject to formal screening in February 2019, through which it was determined that SEA is required in this case.
- 5.5 As a plan for which SEA is required and for which an Environmental Report is being prepared, it is required to comply with the SEA Regulations.
- 5.6 Regulations 12, 13 and 16 of the SEA Regulations are considered of particular relevance in this instance.
- 5.7 Regulation 12(1) states that where environmental assessment is required by any provision of Part 2 of the SEA Regulations, an Environmental Report must be prepared which accords with Regulation 12(2) and 12(3). In this instance this Environmental Report is in the form of the Strategic Environmental Assessment (SEA) for the Danbury Neighbourhood Plan Environmental Report (submission version) (March 2024) ('the SEA').
- 5.8 Regulation 12(2) requires the Environmental Report to identify, describe, and evaluate the likely significant effects on the environment of proposed options, as well as on reasonable alternatives. Case law confirms the need for reasonable alternatives to be appraised, and to the same level of detail as selected options (see *Heard*⁴); and the need to ensure that such an appraisal is on an evidential basis (see *Stonegate*⁵).
- 5.9 At paragraph 5.8 of the SEA, it is explained that the basis for the Site's rejection is the Site Options Assessment Report (November 2021) which found the Site (along with others) to be unsuitable for development.
- 5.10 As discussed, but to reiterate, the Site Options and Assessment Report 2021 was the third iteration of the report.

⁴ *Heard v Broadland DC, South Norfolk DC & Norwich City Council* [2012] EWHC 344 (Admin)

⁵ *Stonegate Homes Ltd v Horsham DC* [2016] EWHC 2512



- 5.11 The Site Options and Assessment Report 2019 assessed the Site and concluded that it was one of nine that were potentially suitable for residential development, subject to mitigation. The assessment included acknowledgement that the Site was within a Conservation Area.
- 5.12 The Site Options and Assessment Report 2020 similarly concluded that the Site was potentially suitable for residential development.
- 5.13 The Site Options and Assessment Report 2021 represented a change in position, concluding the Site was unsuitable. The site assessment conclusions implied that the determinant factor in this conclusion was new heritage advice received from a Chelmsford City Council Heritage Officer. Reference is made to an email received from an officer in March 2020. The Site Options and Assessment Report 2021 states:
- “the entirety of the site should now be ruled out for development as no development would be possible without causing harm to the conservation area and setting of the listed building.”*
- 5.14 The SEA provides reference only to the conclusions of the Site Options and Assessment Report 2021 as the basis for the rejection of the Site as a potential alternative. Given that the first two iterations of this report found the Site to be suitable, that it was only the third iteration at which the position changed, and that this was seemingly on the basis of an email received from a Chelmsford City Council Heritage Officer, the entire basis for the Site’s rejection appears to be this email.
- 5.15 As set out in our response to Basic Condition a) within this representation (and detailed within our representations on the Regulation 14 draft DNP), the rejection of the Site on heritage grounds is not justified. It is of particular relevance to note that, as part of the plan-making process, and in response to consultation on the previous iteration of the DNP, the Built Heritage Assessment in respect of the Site was submitted. This constituted additional evidence very much germane to the appraisal of the Site through the SEA. However, there is no indication the draft DNP’s SEA has considered this evidence or responded in any way to the matters it raises. The *Stonegate* judgment confirms that rejection of an option without appropriate evidence, or done whilst ignoring new evidence that has come forward, can result in the failure to meet the requirement of the SEA Regulations for alternatives to be assessed in a comparable manner.
- 5.16 The rejection of the Site as an option within the SEA was not supported by appropriate evidence, and failed to account for new evidence that had been duly provided through a consultation response. This gives rise to significant concerns vis-à-vis the draft DNP and compliance with SEA Regulations.
- 5.17 Separately, Regulation 13 concerns consultation procedural requirements of SA. It requires that *inter alia* as soon as reasonable practicable after the preparation of the SEA, the responsible authority should bring this to



the attention of persons who are affected or likely to be affected by, or have an interest in its findings. As confirmed through case law⁶, Regulation 13 requires there to be direct consultation with relevant persons and bodies on the SEA, and for such consultation to give public consultees effective opportunity to comment.

- 5.18 Notwithstanding this requirement, it is not clear that comments are invited on the SEA at this stage. The SEA does not appear to be mentioned in the comments form made available via Chelmsford City Council's website. The online consultation portal includes a section on making representations on the draft DNP, but not the SEA per se. Whilst we are aware of the opportunity to comment on the SEA, other interested parties may not be.
- 5.19 Separately, given there is a requirement to consult, it is evidently necessary to ensure that matters raised in response to consultation are given due consideration – such consultation would otherwise be entirely ineffective and redundant. However, and despite having raised concerns with the SEA which accompanied the Regulation 14 draft DNP in our consultation response at this previous stage, it is not evident from the SEA which accompanies the current draft DNP whether the authors were even aware of matters raised, let alone how they have responded to these. On the contrary, there appears to have been no account taken of concerns previously set out. The only reference to consultation responses we have been able to identify within the SEA concerns those of the consultation bodies on the scope. However, as per Regulation 13 and as confirmed through *Kendall*, this is insufficient.

⁶ *Kendall vs Rochford District Council* [2014] EWHC 3866 (Admin)



6. Next Steps and Examination

- 6.1 Many of the issues raised within this representation are those that we sought to alert the Neighbourhood Plan Steering Group to within our previous representations, submitted on the Regulation 14 draft DNP.
- 6.2 We wish to stress that any defects in the SEA of the draft DNP can potentially be cured at subsequent stages in the preparation of the DNP, as confirmed in the *Cogent*⁷ judgment. However, and again as confirmed through *Cogent*, in order to do so, it is essential that the SEA and the DNP avoid merely seeking to justify a strategy already agreed, i.e. it will be necessary to reappraise site D12 in the context of the latest evidence on heritage (the Built Heritage Assessment) and to reconsider the draft DNP in response to this evidence.
- 6.3 We urge the Neighbourhood Plan Steering Group to address the issues set out within this representation prior to progressing to examination.
- 6.4 However, if the DNP was to progress to examination prior to these issues being addressed, we consider that it would be necessary for the examination to take the form of a hearing. Given the extent of the issues identified, including matters pertaining to compliance with SEA Regulations, we submit that a hearing would be necessary to ensure adequate examination of the DNP.

⁷ *Cogent Land LLP v Rochford District Council* [2012] EWHC 2542 (Admin)

Neighbourhood Plan Representation

Danbury Neighbourhood Plan Pre-Submission
(Regulation 14) Consultation Version

Planning Statement

Danbury Neighbourhood Plan Pre-Submission (Regulation 14)



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Appendix A – Built Heritage Assessment



1. Introduction, Background and Overview

- 1.1 This representation on the Danbury Neighbourhood Plan Pre-Submission (Regulation 14) ('the draft DNP') has been prepared by Savills (UK) Ltd on behalf of Medical Services Danbury Ltd. We welcome the opportunity to provide comments at this stage.
- 1.2 In order for a Neighbourhood Plan to proceed to referendum it is required to meet the 'basic conditions' as prescribed in Paragraph 8(2) of Schedule 4B to the Town & Country Planning Act 1990. In our view, and for the reasons detailed in this representation, the draft DNP in its current form does **not** meet these basic conditions. We consider amendments to the draft DNP are required before it is capable of progressing through the Examination stage.
- 1.3 Medical Services Danbury Ltd own land at Bay Meadow, adjacent to Danbury Medical Centre ('the Site'). The Site is being promoted by the owners for residential development with specialist accommodation (including care uses), with potential for Class E commercial use also. It is being assessed through the Neighbourhood Plan making process as site D12.
- 1.4 The draft DNP does not propose allocation of the Site. The purported justification for this is set out within Section 2 of the Danbury Neighbourhood Plan Site Selection and Allocation Report. This references the Site Options and Assessment Report (2021), which forms part of the draft DNP evidence base, and its conclusion that the Site is unsuitable for residential development. This is contrary to the findings of earlier iterations of the Site Options and Assessment Report, with both the 2019 and 2020 versions finding the site to be potentially suitable. The reason for the Site Options and Assessment Report (2021) coming to a different conclusion in respect of the Site's suitability appears to be based on comments received from Chelmsford City Council's Principal Heritage Officer in March 2020, which are provided as supporting evidence document 23a to the draft DNP.
- 1.5 For the reasons set out in this consultation response, we consider the rejection of the Site as a potential residential allocation is unjustified, and as such the draft DNP in its current form does not meet the basic conditions.
- 1.6 Separately, we have concerns with the draft DNP's proposed approach to development beyond the proposed Settlement Boundary as set out at point 9 of sites specific policies for both Site A and Site B. Whilst these are intended to be site-specific, point 9 appears to concern proposals, generally, beyond the settlement boundary and to do so in a way that is directly contrary to national policy. Furthermore, as presently worded it gives rise to potential conflict with Policy DNP6 of the draft DNP. This is discussed in details within Section 4 of this representation.

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- 1.7 Finally, we have concerns regarding the Strategic Environmental Assessment (SEA), specifically the basis on which D12 was rejected from consideration as a reasonable alternative.
- 1.8 This representation is accompanied by a Built Heritage Assessment prepared by specialist heritage consultants, provided as **Appendix A**. The findings of this assessment have helped inform the views within this representation.
- 1.9 Within this representation we have sought to provide constructive comments with a view to enabling the issues we have identified to be addressed ahead of the next iteration of the DNP. We would welcome the opportunity to discuss these matters with the Neighbourhood Plan Steering Group.
- 1.10 The representation is structured as follows:

Section 2 provides an overview of the basic conditions that Neighbourhood Plans are required to meet, with a focus on matters of particular relevance to the matters discussed in subsequent sections of this representation.

Section 3 concerns the Site specifically – its sustainability and deliverability for development – and addresses concerns identified in the draft DNP's evidence base.

Section 4 concerns the draft DNP's approach to development proposals that lie beyond the proposed Settlement Boundary.

Section 5 considers the SEA which accompanies the draft DNP and how it considered the Site.



2. Basic Conditions

- 2.1 This section provides an overview of the basic conditions the DNP will be required to meet if it is to successfully progress through examination and on to referendum.
- 2.2 The basic conditions are set out within paragraph 8(2) of Schedule 4B to the Town & Country Planning Act 1990, and are as follows:
- a) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order;
 - b) having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order;
 - c) having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order;
 - d) the making of the order contributes to the achievement of sustainable development;
 - e) the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);
 - f) the making of the order does not breach, and is otherwise compatible with, EU obligations; and prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order.
- 2.3 Of the above, b) and c) only apply to the consideration of Neighbourhood Development Orders, and not to Neighbourhood Plans.
- 2.4 The draft DNP gives rise to concerns in relation to basic conditions a), d) and f) in particular, for the reasons discussed in subsequent sections of this representation.
- 2.5 Below we set out the relevant policy, guidance and legislation in respect of the issues discussed later in this representation in relation to each of these three basic conditions.

Consistently with the NPPF

- 2.6 In terms of conformity with national policies and advice, we consider the following within the National Planning Policy Framework (NPPF) are of particular relevance, for the reasons discussed further within Sections 3 and 4 of this representation.



Sustainable development

- 2.7 The NPPF clarifies the meaning of sustainable development for the purposes of planning, stating that this has three overarching and interdependent objectives which should be pursued in mutually supportive ways: an economic objective (ensuring that sufficient land of the right types is available in the right places and at the right time to support growth); a social objective (including supporting strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations); and an environmental objective (including making efficient use of land).
- 2.8 The NPPF makes clear that plans must promote sustainable development (paragraph 11).

Meeting development needs

- 2.9 The NPPF is equally clear that plans should meet the development needs of their area (paragraph 11).
- 2.10 In respect of development needs relating to the provision of housing, the NPPF requires strategic policies to be informed by local housing need assessments, utilising the Standard Method as set out in the Planning Practice Guidance, unless exceptional circumstances justify an alternative approach.
- 2.11 In addition, the NPPF stresses that planning policies should account for the housing needs of different groups in the community including *inter alia* people with disabilities and older people.

Ensuring plans are justified

- 2.12 The NPPF confirms the need for robust and proportionate evidence to be prepared which justifies the proposed plan.
- 2.13 The NPPF goes on to emphasise the need for Local Plans and spatial development strategies to be informed throughout their preparation by sustainability appraisal that meets the relevant legal requirements. The PPG¹ states that sustainability appraisal may be useful in demonstrating how a Neighbourhood Plan meets the basic conditions.

Conserving and enhancing the historic environment

- 2.14 The NPPF states that plans should set out a positive strategy for the conservation of the historic environment which takes into account the following:

¹ Paragraph: 072 Reference ID: 41-072-20190509



- g) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
- h) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- i) the desirability of new development making a positive contribution to local character and distinctiveness; and d) opportunities to draw on the contribution made by the historic environment to the character of a place.

2.15 The NPPF also states that Local Planning Authorities should maintain or have access to up-to-date evidence about the historic environment in their area to be used to *inter alia* assess the significance of heritage assets and the contribution they make to their environment.

2.16 Additionally, the NPPF requires Local Planning Authorities to look for opportunities for new development within Conservation Areas to enhance or better reveal their significance. It goes on to state that proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

Achieving Sustainable Development

2.17 The NPPF sets out the role of planning in achieving sustainable development, and the definition of sustainable development for the purposes of planning, as already discussed.

2.18 In addition, the PPG states:

“A qualifying body should demonstrate how its plan or Order will contribute to improvements in environmental, economic and social conditions or that consideration has been given to how any potential adverse effects arising from the proposals may be prevented, reduced or offset (referred to as mitigation measures).”

“In order to demonstrate that a draft neighbourhood plan or Order contributes to sustainable development, sufficient and proportionate evidence should be presented on how the draft neighbourhood plan or Order guides development to sustainable solutions.”²

² Paragraph: 072 Reference ID: 41-072-20190509



EU Obligations

- 2.19 Neighbourhood Plans must not breach, and be otherwise compatible with, EU obligations. These include those in relation to the consideration of environmental impacts, including Directive 2001/42/EC ('the SEA Directive'). The plan-making aspects of the SEA Directive are transposed into UK law through the Environmental Assessment of Plans and Programmes Regulations 2004 (Statutory Instrument 2004 No.1633) ('the SEA Regulations').
- 2.20 Regulation 12(1) of the SEA Regulations states that where environmental assessment is required by any provision of Part 2 of the SEA Regulations, an Environmental Report must be prepared which accords with Regulation 12(2) and 12(3).
- 2.21 Regulation 12(2) requires the Environmental Report to identify, describe, and evaluate the likely significant effects on the environment of proposed options, as well as on reasonable alternatives.
- 2.22 Regulation 12(3) sets out the information required to be included within the Environmental Report, referencing Schedule 2 of the SEA Regulations. Schedule 2 states that SA/SEA should consider short, medium and long term effects; permanent and temporary effects; positive and negative effects; and secondary, cumulative and synergistic effects.
- 2.23 Regulation 16 requires that the reason for the selection of options, and the reasons for the rejection of reasonable alternatives, be made clear within the Environmental Report.

3. The Site and the Draft DNP

The Site and its suitability for residential development

- 3.1 The Site measures c.0.7ha and is broadly triangular in shape. It is a greenfield site that, with the exception of trees and hedgerows along its southern, western and northern boundaries, is relatively featureless.
- 3.2 It is located to the west of Danbury Medical Centre, and specifically to the relatively large existing surface car park which serves this healthcare use.
- 3.3 It is bordered by Maldon Road to the north, Gay Bowers Lane to the west, and Mill Lane to the south. With the exception of the eastern boundary (beyond which lies development) it is a well contained site.
- 3.4 The Site is located centrally within the village. A neighbourhood shopping parade, including a convenience store, is located directly opposite. A public house is c.100 to the west of the Site; a medical centre immediately adjacent to the east; a pharmacy c.200 to the north-west; playing field and village hall c.300m to the west; further convenience retail c.300 to the east and c.350m to the west. Bus stops from which services to neighbouring centres including Chelmsford and Maldon are available are within 400m of the Site.
- 3.5 The Site is considered extremely well located from an accessibility specific, with prospects of future residents being able to utilise alternative modes of transport to the private car, with resultant environmental and social benefits.
- 3.6 The Site is currently in private ownership, with no public access.
- 3.7 The Site lies outside of, but adjoining, the defined settlement boundary as per the current Development Plan. It is not subject to any significant environmental, ecological or landscape constraints that suggest it would be fundamentally unsuitable for development.
- 3.8 It is within Flood Zone 1 – land least at risk of flooding from tidal or fluvial sources.
- 3.9 It is located within the Danbury Conservation Area. However, this does not represent an absolute constraint to development. On the contrary, the NPPF is clear that planning should look for opportunities for new development within Conservation Areas to enhance or better reveal their significance.
- 3.10 The Site has been subject to a detailed assessment of its contribution to the significance of heritage assets, including the Conservation Area, as well as their setting (the Built Heritage Assessment provided as Appendix A to this representation).

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3.11 Following detailed assessment, the Built Heritage Assessment concludes the Site makes only a neutral contribution to the Danbury Conservation Area. The reasons for this, in summary, are set out on page 15 of the report and are as follows.

- *“There is no awareness of this area of land at all, unless one is visiting the Medical Centre. This applies whether one is walking past the Site along the Maldon Road east-west/west-east or along Gay Bowers and Mill Lanes respectively;*
- *“When at the Medical Centre it is evident that the visitor generally enters and leaves the centre by car, focusing on arrival, departure and the centre itself, not the appreciation of this enclosed open space;*
- *“Historically, the Site was parish land with historic maps evidencing that it was barely enclosed with vegetation. At this time, the Site could be said to be more appreciable and accessible to the village; this is not the case today - the Site is private land and cannot be entered by the public”.*

3.12 The Built Heritage Assessment further concludes that the introduction of development to the Site would not cause any harm to either the Danbury Conservation Area or any of the listed buildings within the vicinity (potential impacts on which were also subject of a detailed assessment) provided recommendations within the assessment are incorporated into design and materials, i.e. development is not inappropriate in principle on the Site, from a heritage perspective.

3.13 The Site is greenfield but is not in agricultural use. In addition, it could not be said to have a strong relationship to open countryside to the south. Instead, it is a well contained site, the character of which is influenced by adjacent development which relates well to the established pattern of development in Danbury. Development of this land would complement the existing pattern of development in Danbury, and would not risk any encroachment into the wider countryside.

3.14 The Site is deliverable and would help contribute to a sustainable pattern of development for Danbury.

Planning History

3.15 The Site was subject of a planning application for construction of a 72-bed care home, together with 22 car parking spaces and landscaping (reference 16/01770/FUL). The application sought permission in full, with no matters reserved.

3.16 The application was refused 22 December 2016, and an appeal dismissed on 15 January 2018.



- 3.17 In brief, the appeal was dismissed due to the Site being located outside of the settlement boundary (and the proposed development not being a form of development allowed in rural areas beyond the Green Belt); harm to the Danbury Conservation Area and setting of a listed building; and harm to biodiversity of the proposed development.
- 3.18 In terms of the relevance of this appeal to the draft DNP and its decisions regarding allocations, it is important to recognise that consideration of a detailed appeal scheme for a very specific form of development is fundamentally different to considering an allocation in the preparation of a new or update of a Local Plan or Neighbourhood Plan. The former is considered in the context of the then Development Plan, whereas the latter entails changing the Development Plan. Importantly, it was a detailed development proposal that was considered through the appeal, rather than merely the development of the Site in principle. Whilst harms identified relate to issues that need to be addressed through any alternative proposal for the Site, conclusions reached through the appeal in respect of impact on designated heritage assets and ecology were done so in respect of a detailed scheme that was before the Inspector. They are not issues that should result in the Site being considered unsuitable for *any* form of development, and conclusions reached solely on the basis of the outcome of this appeal would be unjustified.

Proposed Development

- 3.19 The Site is available and achievable for a development of c.25 dwellings, and can also accommodate some specialist housing, including potentially accommodation with elements of care / care home.
- 3.20 Alternatively, the Site should also be considered available and achievable for Class E commercial development.
- 3.21 The landowner is willing to take a flexible approach to the development of the Site. We would welcome further discussions with the Neighbourhood Plan Steering Group as to what development would best help meet the needs of the community, including potential open space provision as part of a development.

Assessment of site through DNP

- 3.22 There have been three iterations of the Site Options and Assessment Report that informs the DNP: 2019, 2020, and 2021 reports.
- 3.23 The Site Options and Assessment Report 2019 assessed the Site (as site D12) and concluded that it was one of nine that were potentially suitable for residential development, subject to mitigation. The assessment included acknowledgement that the Site was within a Conservation Area.



3.24 The Site Options and Assessment Report 2020 similarly concluded that the Site was potentially suitable for residential development.

3.25 However, the Site Options and Assessment Report 2021 represented a change in position, concluding the Site was unsuitable. The site assessment conclusions implied that the determinant factor in this conclusion was new heritage advice received from a Chelmsford City Council Heritage Officer. Reference is made to an email received from an officer in March 2020. The Site Options and Assessment Report 2021 states:

“the entirety of the site should now be ruled out for development as no development would be possible without causing harm to the conservation area and setting of the listed building.”

3.26 Separately, the key documents published alongside the draft DNP includes the Chelmsford Local Plan Heritage Assessments, Technical Note, March 17 and Addendum 2 – for Danbury, April 2019 (document reference 23a). In respect of the Site, this references the appeal for a care home and concludes *inter alia* that the site:

“provides a buffer between the historic core of the village and its modern expansion to the east. Its open character is an important feature within the Conservation Area. The harm through developing the site could not be adequately mitigated”.

3.27 Another document which supports the draft DNP is the Chelmsford City Council Heritage and Conservation Officer advice, March 2020 (document reference 23b). This comprises an email from a Chelmsford City Council Heritage Officer. In respect of the Site it states, in full:

“This site is within the Danbury Conservation Area and is adjacent to a group of listed buildings. The site forms part of [a] significant open space. Development here was considered at the appeal for a care home. Any development here would be harmful to the designated heritage assets, which is a matter of great weight. Even if the site were used for single storey almshouses this would not adequately mitigate the adverse heritage impacts.”

3.28 The assessment of the Site appears to be very limited, and appears to rely on the appeal decision in respect of a specific scheme for a greater quantum of development than now proposed. We have not been able to identify any detailed assessment of the Site’s significance to heritage assets or to the setting of heritage assets that has informed these views. From the evidence we have been able to identify, the conclusions in respect of the Site being fundamentally unsuitable for *any* development from a heritage perspective do not appear to have been reached on an evidential basis. It would be wholly unjustified for the DNP to proceed on the basis of such conclusions.



- 3.29 The lack of an evidential basis for rejecting the Site renders the draft DNP unjustified and contrary to national policy. In terms of the specific reasons for rejecting the Site, it also means that DNP has failed to plan positively in respect of heritage assets, to consider their significance, and look at opportunities to enhance the Conservation Area. Again, this is contrary to the NPPF.
- 3.30 The Neighbourhood Plan Steering Group should be aware of the example of the Oundle Neighbourhood Plan. In December 2019, this Neighbourhood Plan was found to have failed the basic conditions, with one of the issues identified being was the failure to ensure it was supported by robust evidence justifying the spatial strategy and site selection process.
- 3.31 Separately, we note the draft DNP is supported by a Strategic Environmental Assessment (SEA), with the SEA Environmental Report July 2022 forming part of the evidence base. As noted within Section 2, and discussed further in Section 5, where SEA is required of a Neighbourhood Plan, the plan and SEA must comply with the SEA Regulations. As discussed in more detail in Section 5, such regulations include the requirement to identify, describe, and evaluate the likely significant effects on the environment of not just the proposed options, but also reasonable alternatives.
- 3.32 The SEA Environmental Report does not consider the Site to be a potential allocation meriting assessment through the SEA, reporting at paragraph 5.9 that it had been found unsuitable for allocation. From paragraph 5.8, it appears the basis for considering site D12 to be unsuitable is the findings of the Site Options and Assessment Report 2021. However, for the reasons noted above, this is not considered to represent a robust assessment of the Site sufficient to justify its rejection.
- 3.33 As confirmed in the *Stonegate*³ judgment in relation to the Henfield Neighbourhood Plan, it is important that the reasons for rejection of options are based on robust evidence. Failure to ensure the Neighbourhood Plan is adequate can result in a Neighbourhood Plan being quashed by the High Court, as was the case in *Stonegate*. The judgment in *Stonegate* included the following:

“The reason for rejecting [an option] is flawed based as it is upon an inadequate, if that, evidence base. The requirement, under the Directive, that the alternatives are assessed in a comparable manner and on an accurate basis was simply not met” (Paragraph 74)

³ *Stonegate Homes Ltd v Horsham DC* [2016] EWHC 2512

- 3.34 A detailed heritage assessment has been undertaken in respect of the Site now, and submitted alongside this representation. We consider it essential that its findings are given due consideration in the plan-making process. To ignore this evidence would be to make a similar mistake to that which was made in the preparation of the Henfield Neighbourhood Plan, where an option was rejected on the basis of perceived adverse impact relating to highways, despite evidence to the contrary. As per the conclusions of the Built Heritage Assessment, the Site can be developed in a manner that would not harm the Conservation Area or other heritage assets. Given the other characteristics of the Site as discussed above, it therefore clearly represents an opportunity to deliver a highly sustainable development that addresses a specific need through accommodation located centrally within the village. Failure to reconsider the Site's potential allocation would be to overlook an opportunity to help facilitate sustainable development.
- 3.35 The above concerns can be addressed through amendments to the draft DNP ahead of the next iteration of the plan, including revisiting the site assessment and SEA work undertaken to date with the benefit of the findings of the Built Heritage Assessment.

Draft DNP and ensuring specialist housing needs are met

- 3.36 As noted in Section 2, the NPPF requires plans to not only meet housing needs in general terms, but to consider the housing needs of all parts of the community, including the needs of older people and of those with disabilities.
- 3.37 The Danbury Housing Needs Assessment which forms part of the evidence base of the draft DNP makes a number of references to Danbury having an ageing population, but does not go on to suggest what this might mean in terms of specialist accommodation needs.
- 3.38 Furthermore, the draft DNP itself does not appear to contain any policies that expressly address the accommodation needs of older people / people who may need care. This is despite acknowledging at paragraph 2.28 that the Parish's population is ageing.
- 3.39 The absence of policies to address specialist housing is particularly problematic given that the adopted Chelmsford Local Plan does not address this issue in a manner required by current national policy – it should be noted that the Chelmsford Local Plan was prepared and examined in relation to the 2012 NPPF, i.e. prior to the introduction into national policy of the exhortation to address the housing needs of the different sections of the community, including older people. Indeed, the Chelmsford Local Plan's only policy (DM1) that includes encouragement to provide specialist accommodation only applies to developments of more than 100 dwellings.

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- 3.40 As such, it would not apply to any of the allocations currently proposed by the draft DNP. In any case, Policy DM1 does not require a specific proportion or quantum of specialist accommodation. Consequently, unless the draft DNP is updated to address this issue, there would be nothing in the Development Plan to help ensure that the accommodation needs of all of the community in Danbury are addressed, contrary to the NPPF.
- 3.41 We consider the draft DNP's failure to address the accommodation needs of older people to be a significant deficiency in the current iteration of the plan, one which renders it contrary to the NPPF and undermines its ability to achieve sustainable development (particularly in relation to the social dimension of sustainable development).
- 3.42 This is a flaw however that can be cured, and the Site represents a sustainable one that is available for allocation to help do so.

4. Approach to Development in the Countryside

- 4.1 Policy DNP6 of the draft DNP sets out the approach to development beyond the Defined Settlement Boundary (DSB). It comprises three strands:
1. DSB to be tightly drawn around any new built housing beyond the current DSB (2022).
 2. Land within the development site, beyond the built area to be designated as open space so it remains exempt from further development.
 3. Any development proposals outside the Defined Settlement Boundary should comply with the relevant Local Plan policies relating to the rural area.
- 4.2 The 'relevant Local Plan' in this case is currently the Chelmsford Local Plan adopted May 2020. Policy DM8 of this Local Plan concerns new buildings and structures in the rural area. It sets out a positive, criteria-based policy, which confirms in what circumstances proposals for development beyond settlement boundaries (but in neither the Green Belt nor Green Wedge) will be supported.
- 4.3 One potential issue with this proposed approach is that, whilst the current Chelmsford Local Plan contains a relevant policy on development beyond the settlement boundary, this Local Plan is under review. Whilst an unlikely scenario, if the new Local Plan were not include any policy on development beyond settlement boundaries and / or contain a policy that was not compatible with the DNP objectives, this could prove problematic.
- 4.4 Separately, we note that in addition to Policy DNP6, within site-specific policies for proposed allocations Site A and Site B, at point 9 in both cases, the policy makes reference to development beyond Defined Settlement Boundaries. It states that such areas will be exempt from further development. We assume this is intended to restrict new development within the area beyond the Defined Settlement Boundary within Site A and Site B, respectively, only. However, we are concerned that a decision-maker could infer this could / should apply to proposals for development beyond the Defined Settlement Boundary, generally.
- 4.5 Such an approach would not only conflict with Policy DNP6 (given how the relevant Local Plan policy is currently written) but would also conflict with national policy. As has been confirmed on appeal⁴, absolute restrictions on development within the countryside are incompatible with the NPPF and its call for a more balanced approach in which the merits of proposals are considered in addition to harms.
- 4.6 We suggest the draft DNP would benefit from further clarification and revised wording to ensure that it is not seen as being overly restrictive on development proposals beyond the Defined Settlement Boundary.

⁴ For example, Appeal Ref: APP/C1570/W/19/3242550 Land south of Rush Lane, Elsenham. Decision date: 4 September 2020

5. Strategic Environmental Assessment

- 5.1 The draft DNP is accompanied by SEA Environmental Report.
- 5.2 SEA is not always required for Neighbourhood Plans. However, within the SEA Environmental Report it is confirmed that the DNP was subject to formal screening in February 2019, through which it was determined that SEA is required in this case.
- 5.3 As a plan for which SEA is required and for which an Environmental Report is being prepared, it is required to comply with the SEA Regulations.
- 5.4 The relevant SEA Regulations insofar as concerns issues discussed in this representation are described in Section 2 of this representation.
- 5.5 We note that in rejecting the Site (D12) as a potential reasonable alternative, the SEA Environmental Report appears to place great reliance on the Site Options and Assessment Report (2021) findings on the suitability of the Site for residential development. This is seemingly confirmed at paragraph 5.8 of the SEA Environmental Report, in which it states:

“Since the 2020 Addendum, additional highways and landscape evidence has been gathered and considered, alongside the updated Chelmsford City Council Strategic Housing and Economic Land Availability Assessment (SHELAA) 2021, in a new Sites Options Assessment Report in November 2021. This report, considering the most up to date available evidence, now considers Site D7 as potentially suitable for allocation (alongside Sites D5, D9, D11, D14, D15, D20, and D21), whilst notably finding Sites D4, D8, D10, and D12 as not suitable for allocation with significant constraints present”.

- 5.6 There does not appear to have been any additional highways or landscape evidence, or anything within the SHELAA 2021, since 2020 that could result in the Site now being considered fundamentally unsuitable for residential development. The only difference appears to be how the Site was assessed in the Site Options and Assessment Report 2021. As discussed in detail in Section 4, the conclusion its conclusion that the Site was unsuitable was not justified. Furthermore, subsequent detailed assessment work has now confirmed concerns raised in respect of the Site’s suitability were misplaced.
- 5.7 The lack of appropriate justification in the SEA Environmental Report for rejection of the Site gives rise to concerns relating to compliance with SEA Regulations and thus basic condition f) (the making of the order does not breach, and is otherwise compatible with, EU obligations), as explained below.
- 5.8 As noted in Section 2, Regulation 12 of the SEA Regulations requires the Environmental Report to identify,



describe, and evaluate the likely significant effects on the environment of proposed options, as well as on reasonable alternatives. As confirmed in *Stonegate*, flaws in the assessment of options (as appears to be the case in the draft DNP's SEA Environmental Report and site D12) can result in a failure to comply with Regulation 12. It is critical that the Environmental Report's conclusions are reached on an evidential basis, but this does not appear to be the case in respect of site D12 and the DNP.

- 5.9 We wish to stress that any defects in the SEA of the draft DNP can potentially be cured at subsequent stages in the preparation of the DNP, as confirmed in the *Cogent*⁵ judgment. However, and again as confirmed through *Cogent*, in order to do so, it is essential that the SEA and the DNP avoid merely seeking to justify a strategy already agreed, i.e. it will be necessary to reappraise site D12 in the context of the latest evidence on heritage (the Built Heritage Assessment) and to reconsider the DNP in response to this revised assessment.

⁵ *Cogent Land LLP v Rochford District Council* [2012] EWHC 2542 (Admin)

LAND AT MALDON ROAD, DANBURY

BUILT HERITAGE ASSESSMENT
RE REPRESENTATIONS TO DANBURY NEIGHBOURHOOD PLAN

JCH01920
Land at Maldon Road, Danbury
Medical Services Danbury Ltd.
March 2023

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1.0 INTRODUCTION

This Built Heritage Assessment has been researched and prepared by RPS on behalf of Medical Services Danbury Ltd. in order to support their pre-submission draft representations to the Neighbourhood Plan in respect of development at Land at Maldon Road, Danbury (henceforth called the 'Site'). It should be read in conjunction with the accompanying Savills representations.

The Site forms a small section of the designated Danbury Conservation Area but does not contain any further designated or non-designated built heritage assets. Within a 250 metre search radius lie 10 designated built heritage assets.

Under Paragraph 194 of the National Planning Policy Framework (NPPF) there is a requirement for an applicant to "describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance". It is therefore necessary to ascertain any effect development at the Site may have to the conservation area and to the settings and thus significance of any built heritage assets in the vicinity.

The Built Heritage Assessment commences with a summary of relevant legislative framework, planning policy and guidance at both national and local levels, with special regard to policies and guidance relating to development within conservation areas and the setting of heritage assets. It provides an overview of the history of the area and the Site and assesses the significance of the identified heritage assets, including any contribution made by the Site to that significance.

The findings of this report are based on known conditions at the time of writing and therefore all findings and conclusions are limited to a period of three years. All maps, plans and photographs are for illustrative purposes only.



Figure 1: Location of Site in Essex

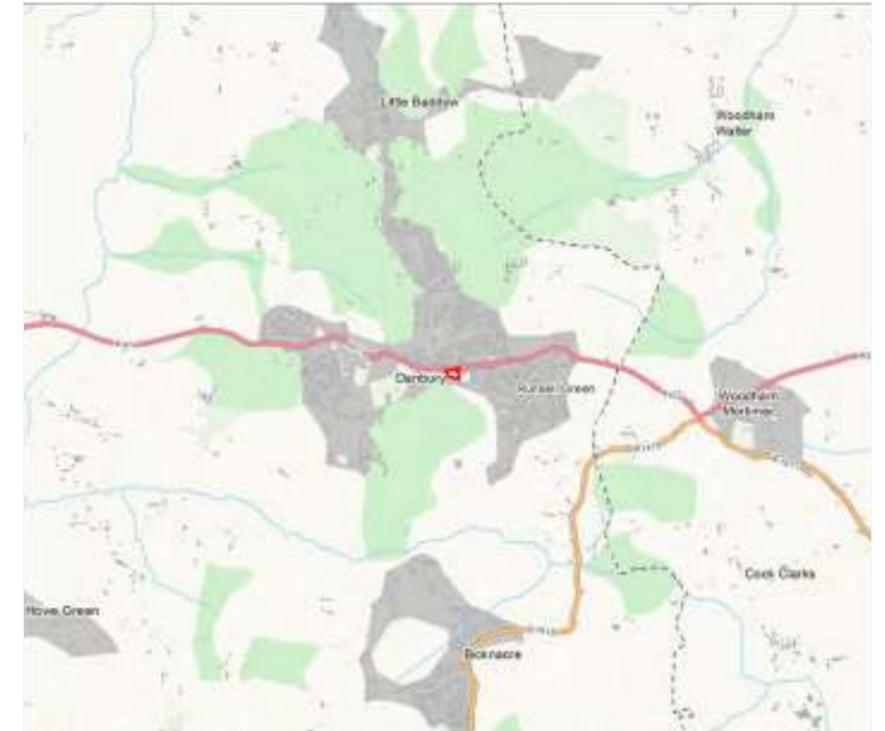


Figure 2: Location of Site in relation to local area

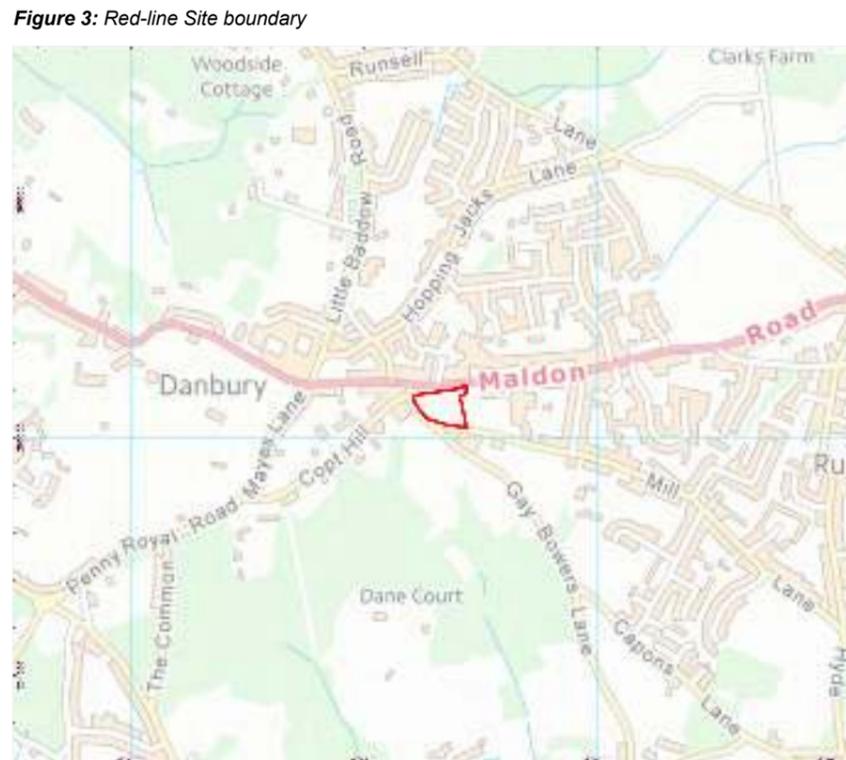


Figure 3: Red-line Site boundary



Figure 4: Aerial view of Site 2022

2.0 LEGISLATIVE & PLANNING POLICY FRAMEWORK

2.1 LEGISLATION & NATIONAL PLANNING POLICY

This section provides a review of relevant legislation, planning policy and guidance, at both national and local levels, with regard to built heritage assets and the current representations or any future development proposal.

Legislation

Where any development may affect designated heritage assets, there is a legislative framework to ensure proposed works are developed and considered with due regard to their impact on the historic environment. This extends from primary legislation under the Planning (Listed Buildings and Conservation Areas) Act 1990.

Section 66 General duty as respects listed buildings in exercise of planning functions states that: “(1) In considering whether to grant planning permission or permission in principle for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses”. However, unlike the parallel duty under section 66, there is no explicit protection for the setting of a conservation area.

The meaning and effect of these duties have been considered by the courts in recent cases, including the Court of Appeal’s decision in relation to *Barnwell Manor Wind Energy Ltd v East Northamptonshire District Council* [2014] EWCA Civ 137. The Court agreed within the High Court’s judgement that Parliament’s intention in enacting section 66(1) was that decision makers should give ‘considerable importance and weight’ to the desirability of preserving (i.e. keeping from harm) the setting of listed buildings.

For development within a conservation area section 72 of the Act requires the decision maker to pay ‘special attention [...] to the desirability of preserving or enhancing the character or appearance of that area’. The duty to give special attention is considered commensurate with that under section 66(1) to give special regard, meaning that the decision maker must give considerable importance and weight to any such harm in the planning balance.

National Planning Policy

National Planning Policy Framework (Ministry of Housing, Communities and Local Government, July 2021)

In March 2012, the government published the National Planning Policy Framework (NPPF), which was most recently updated in July 2021. The NPPF is supported by the National Planning Practice Guidance (NPPG), which was published online 6th March 2014 and has since been periodically updated. The NPPF is the principal document that sets out the Government’s planning policies for England and how these are expected to

be applied. It defines a heritage asset as a: ‘*building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest*’. This includes both designated and non-designated heritage assets.

Section 16: Conserving and Enhancing the Historic Environment relates to the conservation of heritage assets in the production of local plans and decision taking. It emphasises that heritage assets are ‘*an irreplaceable resource, and should be conserved in a manner appropriate to their significance*’.

189. Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

190. Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account: a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation; b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring; c) the desirability of new development making a positive contribution to local character and distinctiveness; and d) opportunities to draw on the contribution made by the historic environment to the character of a place.

194. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary.

195. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal.

197. In determining applications, local planning authorities should take account of: a) the desirability of sustaining and enhancing the significance

of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness.

199. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

202. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

206. Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

207. Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 201 or less than substantial harm under paragraph 202, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.

2.3 NATIONAL GUIDANCE

National Planning Guidance

Planning Practice Guidance (PPG) (Ministry of Housing, Communities and Local Government)

The Planning Practice Guidance (PPG) has been adopted in order to aid the application of the NPPF. It reiterates that conservation of heritage assets in a manner appropriate to their significance is a core planning principle.

Key elements of the guidance relate to assessing harm. It states that substantial harm is a high bar that may not arise in many cases and that while the level of harm will be at the discretion of the decision maker, generally substantial harm is a high test that will only arise where a development seriously affects a key element of an asset's special interest. It is the degree of harm, rather than the scale of development, that is to be assessed.

Importantly, it is stated harm may arise from works to the asset or from development within its setting. Setting is defined as *'the surroundings in which an asset is experienced, and may be more extensive than the curtilage'*. A thorough assessment of the impact of proposals upon setting needs to take into account, and be proportionate to, the significance of the heritage asset and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.

Overview: Historic Environment Good Practice Advice in Planning

In March 2015 Historic England (formerly English Heritage) withdrew the PPS5 Practice Guide document and replaced it with three Good Practice Advice in Planning Notes (GPAs): 'GPA1: Local Plan Making', 'GPA2: Managing significance in Decision-Taking in the historic Environment', and 'GPA3: The Setting of Heritage Assets'.

These GPAs provide supporting guidance relating to good conservation practice. The documents particularly focus on how good practice can be achieved through the principles included within national policy and guidance. As such, the GPAs provide information on good practice to assist LPAs, planning and other consultants, owners, applicants and other interested parties when implementing policy found within the NPPF and PPG relating to the historic environment.

GPA1: The Historic Environment in Local Plans (March 2015)

This advice note focuses on the importance of identifying heritage policies within Local Plans. The advice echoes the NPPF by stressing the importance of formulating Local Plans based on up-to-date and relevant evidence on economic, social and environmental characteristics and prospects of the area, including the historic environment.

GPA2: Managing Significance in Decision-Taking in the Historic Environment (March 2015)

This document provides advice on the numerous ways in which decision-taking in the historic environment can be undertaken, emphasising that the first step for all applicants is to understand the significance of any affected heritage asset and the contribution of its setting to its significance. In line with the NPPF and PPG, this document states that early engagement and expert advice in considering and assessing the significance of heritage assets is encouraged, stating that *'development proposals that affect the historic environment are much more likely to gain the necessary permissions and create successful places if they are designed with the knowledge and understanding of the significance of the heritage assets they may affect.'*

The advice suggests a structured staged approach to the assembly and analysis of relevant information, this is as follows:

1. Understand the significance of the affected assets;
2. Understand the impact of the proposal on that significance;
3. Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF;
4. Look for opportunities to better reveal or enhance significance;
5. Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change; and,
6. Offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.

The advice reiterates that heritage assets may be affected by direct physical change or by change in their setting. Assessment of the nature, extent and importance of the significance of a heritage asset and the contribution of its setting at an early stage can assist the planning process resulting in informed decision-taking.

This document sets out the recommended steps for assessing significance and the impact of development proposals upon a heritage asset, including examining the asset and its setting and analysing local policies and information sources. In assessing the impact of a development proposal on the significance of a heritage asset the document emphasises that the cumulative impact of incremental small-scale changes may have as great an effect on the significance of a heritage asset as a larger scale change.

Crucially, the nature and importance of the significance that is affected will

dictate the proportionate response to assessing that change, its justification, mitigation and any recording which may be necessary. This document also provides guidance in respect of neglect and unauthorised works.

GPA3: The Setting of Heritage Assets (Second Edition, December 2017)

This advice note focuses on the management of change within the setting of heritage assets. This document replaces *GPA3: The Setting of Heritage Assets* (March 2015) and the previously withdrawn *Seeing History in the View* (English Heritage, 2011) in order to aid practitioners with the implementation of national legislation, policies and guidance relating to the setting of heritage assets found in the 1990 Act, the NPPF and PPG. The guidance is largely a continuation of the philosophy and approach of the 2011 and 2015 documents and does not present a divergence in either the definition of setting or the way in which it should be assessed.

As with the NPPF the document defines setting as *'the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve'*. Setting is also described as being a separate term to curtilage, character and context. The guidance emphasises that setting is not a heritage asset, nor a heritage designation, and that its importance lies in what it contributes to the significance of the heritage asset, or the ability to appreciate that significance. It also states that elements of setting may make a positive, negative or neutral contribution to the significance of the heritage asset.

While setting is largely a visual term, with views considered to be an important consideration in any assessment of the contribution that setting makes to the significance of an asset, and thus the way in which an asset is experienced, setting also encompasses other environmental factors including noise, vibration and odour. Historical and cultural associations may also form part of the asset's setting, which can inform or enhance the significance of a heritage asset. Further clarification on this matter has been provided by the High Court in relation to *Steer v Secretary of State for Communities and Local Government and Others* [2017] which stresses the potential importance and contribution of non-visual elements of setting.

This document provides guidance on practical and proportionate decision making with regards to the management of change within the setting of heritage assets. It is stated that the protection of the setting of a heritage asset need not prevent change and that decisions relating to such issues need to be based on the nature, extent and level of the significance of a heritage asset, further weighing up the potential public benefits associated with the proposals. It is further stated that changes within the setting of a heritage asset may have positive or neutral effects.

The document also states that the contribution made to the significance of

2.1 NATIONAL PLANNING POLICY

heritage assets by their settings will vary depending on the nature of the heritage asset and its setting, and that different heritage assets may have different abilities to accommodate change without harming their significance. Setting should, therefore, be assessed on a case-by-case basis.

Historic England recommend using a series of detailed steps in order to assess the potential effects of a proposed development on significance of a heritage asset. The 5-step process is as follows:

1. Identify which heritage assets and their settings are affected;
2. Assess the degree to which these settings and views make a contribution to the significance of a heritage asset(s) or allow significance to be appreciated;
3. Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it;
4. Explore ways to maximise enhancement and avoid or minimise harm; and,
5. Make and document the decision and monitor outcomes.

Overview: Historic England Advice Notes in Planning

In addition to the above documentation, Historic England has published three core Heritage Advice Notes (HEANs) that provide detailed and practical advice on how national policy and guidance is implemented. These documents include: *HEAN 1: Understanding Place: Conservation Area Designation, Appraisal and Management* (February 2019), *HEAN 2: Making Changes to Heritage Assets* (February 2016), *HEAN 3: The Historic Environment and Site Allocations in Local Plans* (October 2015) and *HEAN 12: Statements of Heritage Significance: Analysing Significance in Heritage Assets* (October 2019).

Conservation Principles, Policies and Guidance (English Heritage, April 2008 and emerging policy: Conservation Principles for the Sustainable Management of the Historic Environment (Historic England, Consultation Draft November 2017)

Historic England's original document was primarily intended to ensure consistency of advice and guidance through the planning process and was commended to LPAs to ensure that all decisions about change affecting the historic environment were informed and sustainable. Four main heritage values were highlighted: aesthetic, evidential, communal and historical. The document emphasised that *'considered change offers the potential to enhance and add value to places...it is the means by which*

each generation aspires to enrich the historic environment' (Paragraph 25). Historic England are currently updating this document in order to set out their approach to conservation in a format that is more accessible and aligned with the language of the NPPF and current legislation. A key change is the heritage values to be used when seeking to understand the significance of a built heritage asset in order to align with the terms used in the NPPF. These are *historic, archaeological, and architectural and artistic*.

2.3 LOCAL PLANNING POLICY

Development Plan Documents

Chelmsford City Council

The local planning authority for the Site is Chelmsford City Council (CCC) and development on the Site will be subject to compliance with their Local Development Documents.

Chelmsford Local Plan 2013-2036 (adopted May 2020)

The following policies are relevant to the Proposed Development:

Policy DM13 – Designated Heritage Assets

A.) The impact of any development proposal on the significance of a designated heritage asset or its setting, and the level of any harm, will be considered against any public benefits arising from the proposed development.

Where there is less than substantial harm to the heritage asset this will be weighed against the public benefits of the development proposal, including securing the optimum viable use of the heritage asset. The Council will take account of the desirability of sustaining and enhancing the significance of heritage assets and the positive contribution that conservation of heritage assets can make to sustainable communities, local character and distinctiveness.

B) Listed Buildings

In addition to Part A) the Council will preserve Listed Buildings and will permit proposals where:

ii. development within the setting of a listed building would not adversely affect the significance of the listed building, including views to and from the building, landscape or townscape character, land use and historic associations.

C) Conservation Areas

In addition to Part A) development will be permitted in Conservation Areas where: i. the siting, design and scale would preserve or enhance the character or appearance of the area; and ii. building materials and finishes are appropriate to the local context; and iii. features which contribute to the character of the area are retained; and iv. important views are preserved.

Policy DM14 – Non-Designated Heritage Assets

Proposals will be permitted where they retain the significance of a non-designated heritage asset, including its setting. Where proposals would lead to harm to the significance of a non-designated heritage asset or its loss, proposals should demonstrate that: i. the level of harm or loss is justified following a balanced judgement of harm and the significance of the asset; and ii. harm is minimised through retention of features of significance and/or good design and/or mitigation measures.

Strategic Growth Site Policy 13—Danbury

An allocation of around 100 new homes to be accommodated within or adjoining the Defined Settlement Boundary of Danbury. The site(s) to accommodate this allocation will be identified and consulted upon through the emerging Danbury Neighbourhood Plan. Amount and type of development: Around 100 new homes of mixed size and type including Pitched roofs with tiles of natural appearance are always preferable to flat affordable housing.

The policy's Site masterplanning principles are principally concerned with conserving and enhancing Sites of Special Scientific Interest (SSSI) in and around Danbury (Blake's Wood and Lingwood Common SSSI, Woodham Walter Common SSSI and Danbury Common SSSI). Heritage is not mentioned in the body of the policy but within the following paragraph: 7.357 There are a number of heritage assets in and around Danbury which may need to be considered by future development proposals. These include Danbury Conservation Area, two Registered Parks and Gardens, Danbury Hill Fort Scheduled Monument and a variety of listed buildings.

The Council is currently reviewing its Local Plan which is proposed to cover the 2022 - 2041 period. The Local Development Scheme states that the revised Plan will be adopted in 2025.

Danbury Parish Council

Danbury Planning Framework (DPF) Supplementary Planning Document (SPD) (2011)

The DPF was developed from information in questionnaires and workshops that was supplied by the residents of Danbury, including from the Parish Plan (2003). It is a guidance document in respect of designing new development, agreeing enhancements, and caring for/maintaining the village. The document has been adopted as part of the Council's planning policy within its Local Development Framework. Until the Danbury Neighbourhood Plan is adopted, it is still a material consideration in respect of planning applications.

DPF1: Development proposals within the Parish of Danbury will have to satisfy the requirements of the Core Strategy and Development Control Policies and Supplementary Planning Documents issued by Chelmsford Borough Council and any succeeding statement of planning policy existing at the time that a planning application is made. The design of new development, whether in an application for planning permission or permitted development should pay due regard to the guidance in the Danbury Planning Framework and should respect the quality of the local natural and historic environment, character, landscape, street scene and spatial quality.

DPF7: Development proposals should demonstrate how they pay special regard to the environment and character of the site, the surroundings and

the immediate local neighbourhood.

DPF21: Any development should be sympathetic to its surroundings in physical and design terms.

DPF22: Materials and finishes used (in both commercial and residential developments) should reflect the character of the area in which they are located and blend with the overall presentation and setting of the building concerned; natural materials are preferred.

DPF26: Pitched roofs with tiles of natural appearance are always preferable to flat roofs or pitched roofs with concrete tiles.

DPF29: Timber for external cladding, weather boards and box eaves is preferred to UPVC sheet.

DPF30: Boundaries delineated by natural indigenous hedging are more acceptable and complementary to the village character than bland fencing, featureless aesthetically unattractive walls or large ornate iron gates and railings.

DPF32: The remaining undeveloped part of Bay Green Meadow should be retained as a meadow and free of development in the future to protect the valuable open landscape character.

Pre-Submission Danbury Neighbourhood Plan (2023-2036)

A Neighbourhood Plan for Danbury (NPD) has been drafted for Danbury Parish Council by the Neighbourhood Plan Steering Group; once adopted this document will form part of the LDF and a material consideration in respect of planning applications.

The following within the draft document concern built heritage:

10. Heritage

Objective

Conserve and enhance Danbury's heritage assets and features which contribute to the village. Development should respond positively to and contribute to the special character and qualities that help define Danbury.

There are no specific policies relating to designated built heritage assets; instead the documents refers to the Chelmsford Local Plan which states that these will be protected and enhanced due to their contribution to the character of Danbury.

Policy DNP10: Open Spaces

Development proposals resulting in the loss of green space which would cause harm to the character of the village will not be permitted.

3.1 HISTORICAL DEVELOPMENT - DANBURY



Figure 5: The Recreation Ground

Danbury derived its name from the Saxon Daeningis Tribe who built a hill fort on Danbury Hill. In 1066 the village was called Daeningaberia and was given to Geoffrey De Mandeville by King William, following which it was subject to the feudal system for five centuries. Danbury was formed of the manors of Runsell, St. Cleres/Herons and a minor section of Gibcracks.

The church of St. John the Baptist, originally constructed in 1233 on the former hill fort site, forms the historical centre of the village. The north aisle of the extant structure is the oldest existing part and is believed to have been endowed in 1290 as a chapel "for the soul of William de St Clere" by the St Clere family.

Danbury became renowned for tile and brick manufacture during the Medieval era, due to its availability of clayey alluvium materials; Eves Corner was the site of a brick kiln that utilised until 1792. A large number of local historic buildings were, therefore, styled with local resources, for example Essex's first substantial property of brick - the fifteenth century brick Danbury Place (later replaced and renamed Danbury Palace and now a residential development). The use of brick facades was extended to other local buildings in the seventeenth and eighteenth centuries. Numerous Essex churches and Kings Lodge in Windsor Great Park have also utilised the village's distinctive floor tiles. The local landscape of Danbury was impacted by this industry, due to a large number of ponds being created as brick earth was extracted.



Figure 6: St. John the Baptist Church

The village's location was one of strategic importance due to its midpoint position on the Chelmsford/Maldon road; extremely heavy loads were transported between these locations due to an abundance of business opportunities along the route. Danbury was also on the London to Maldon main coaching road. The main road was maintained, however the Chelmer and Blackwater Navigation saw significant traffic removed from this route. Due to steep hills in the area, the village was bypassed by the railways in the nineteenth century.

Danbury's extensive areas of common land were utilised as army camps during the Napoleonic War and World Wars I and II. Later, due to its numerous commons, woodlands and long views, the parish was seen as a countryside retirement location, in addition to being a popular location for day visitors. These areas are still maintained today, in conjunction with the provision of numerous nature reserves and a large number of public footpaths.

Until the twentieth century, the parish was very dispersed, with separate hamlets separated by either woodland, open fields or common land. Properties utilised their personal or communal wells until mains water was supplied in 1892. The parish saw increased building at this time due to the growth of private motor vehicle ownership and the surfacing and kerbing of the main road. Further development and/or expansion occurred post WWII to several key character areas: Mildmays, the Lanes, The Park, Runsell



Figure 7: The Pond at Eves Corner

Green and Hopping Jacks. Additionally, the main road saw a number of infill developments along or close to its boundaries. This increased the local population to between five and six thousand inhabitants.

Today Danbury is considered as a large village and has a combination of residential, retail, school and leisure facilities. Eves Corner forms the village centre and has a large pond whose origins were either a watering place for farm animals, or an old clay pit. It is edged by vegetation, including a number of trees. The area surrounding the parish is comprised of woodland, commons or small-scale sheep/arable farming.

In and around Danbury there are three Sites of Special Scientific Interest (SSSIs), three scheduled monuments, 59 listed buildings, two registered parks and gardens and a conservation area. It also has protected lanes and a large number of trees are protected by tree preservation orders.

3.2 HISTORICAL MAP PROGRESSION

An understanding of historic context may reveal historic associations between heritage assets or with the site of proposed development and may be pertinent to an assessment of their settings. Therefore, this map regression exercise documents past and current development in relation to the Site area, as shown by a red line on the following maps.

The earliest available map is the 1777 Chapman and Andre Map of Essex, figure 8. This shows the Site as open land located to the south of Maldon Road, forming a junction point between it and the already formed roads to south. Surrounding the Site are a combination of open fields and commons. Development is already evident to west, in conjunction with a series of further roads. Danbury windmill is located in fairly close proximity to east of the Site.

The 1799 Ordnance Survey Drawing (OSD), figure 9, evidences that the Site remained undeveloped whilst Danbury has expanded in scattered settlements. The surrounding area remains as either parcels of agricultural land or further open spaces.

Figure 10, the 1839 Tithe Map, has an accompanying Tithe Apportionment document which states that the Site consisted of "Parish Land" belonging to and used by William Hilton, who also owned a number of other plots of land within the village such as House Yards (utilised as a Garden) the Upper Mill Field (Arable and Pasture) and The Mill - all of the latter in use by Joshua Mallett.

The following Ordnance Survey Map (OSM) of 1874, figure 11, and the OSM of 1922, figure 12, page 10, illustrate that the Site remains undeveloped. Notable buildings, such as Hill House and Belvedere House are marked. The local area started to expand during the early part of the twentieth century, although this is not yet apparent in proximity to the Site.

The OSM of 1953, figure 13, page 10, demonstrates that development has occurred to the east both of the recreation ground and of Belvedere House in addition to the west of Eves Corner. Some development has also been located just beyond the Site's boundary, to the north of the Main Road. A significant number of old gravel pits are noted to the south of Copthill; various fields and woodland are also visible.

Figure 14, the 1993 OS map, page 10, shows how Danbury has developed and expanded over the former 40 years. The majority of the area to north, north-east and north-west of the Main Road and the Site has now been developed, whilst the Site itself remains undeveloped.

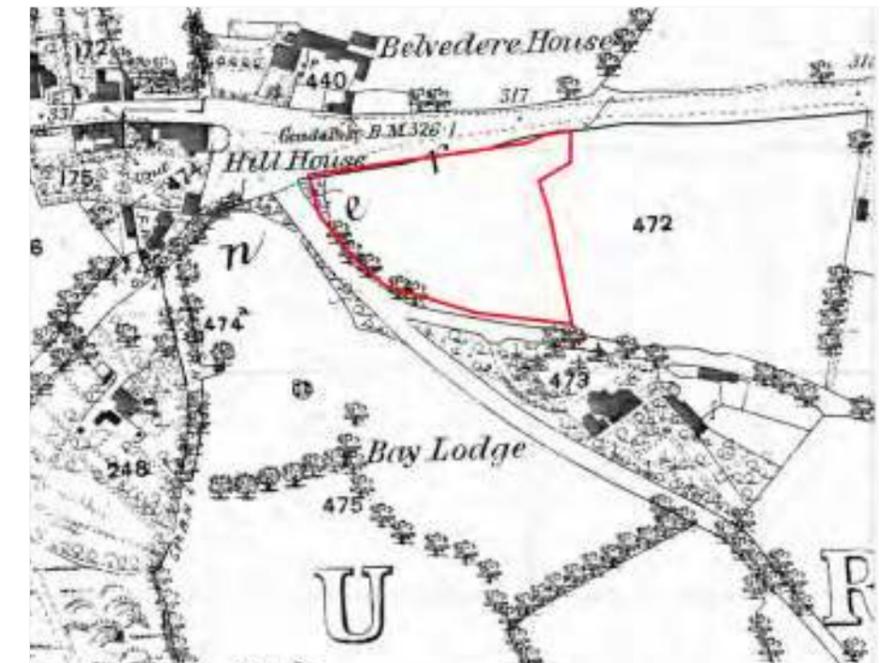
The following figures 15, 16 and 17, page 10, Aerial Photographs, 2000, 2011 and 2017, evidence the continuing evolution of this part of Danbury. The Site remains undeveloped, however in its proximity, just beyond its eastern boundary, the Danbury Medical Centre and Mission Church were both constructed by 2017;.



Figure 8 1777 Chapman and Andre Map of Essex  Approximate Site Location



Figure 9: 1799 Ordnance Survey Drawing  Approximate Site Location



3.2 HISTORICAL MAP PROGRESSION



Figure 12: 1922 Ordnance Survey Map

Figure 15: 2000 Aerial Photograph



Figure 13: 1953 Ordnance Survey Map

Figure 16: 2011 Aerial Photograph

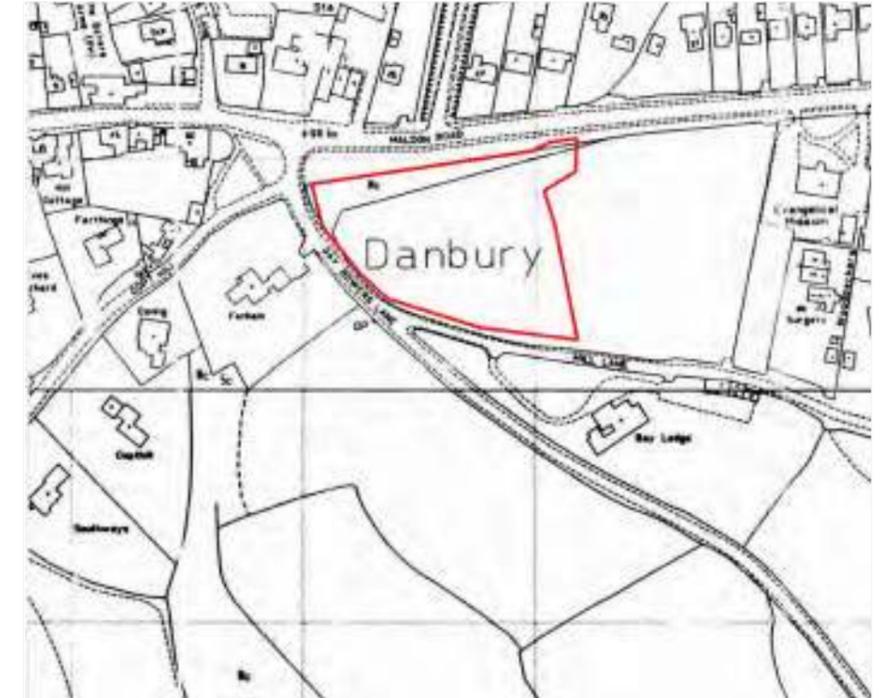


Figure 14: 1993 OS Map

Figure 17: 2017 Aerial Photograph



3.3 HISTORIC ENVIRONMENT RECORD

Initial desk-based research was undertaken, utilising the Essex Historic Environment Record (EHER) and Historic England’s National Heritage List for England. Chelmsford City Council does not maintain a Register of buildings of local value for Danbury.

An area search of 250 metres was decided on, based on professional judgement and the extent of the Site boundary, with the understanding that it would provide a suitable context in order to understand the heritage potential of the Site and any potential impacts to the significance of built heritage assets within this radius.

This search radius identified that the Site forms part of the Danbury Conservation Area (DCA) but does not contain any further designated or non-designated built heritage assets. There are also 10 Grade II listed built heritage assets within this area. It is therefore necessary to ascertain any effect development at the Site would have to the conservation area and to the settings and thus significance of any built heritage assets in the vicinity.

After further detailed examination and a comprehensive site visit, it was established that four built heritage assets could potentially experience some effect either to their significance or their setting, and thus significance, from any future development of the Site. The other built heritage assets were scoped out from further analysis due to the following facts: they have no known association with the Site, their settings, and thus significance, are not reliant upon it or they remain well removed and/or are screened from the Site so that there is a lack of intervisibility between them. They have, therefore, not been assessed within the forthcoming sections.

The EHER record illustrating the DCA and the statutorily listed buildings found within the 250 metre radius is illustrated in figure 18, right. Designated built heritage assets within this area that may be affected by the Proposed Development are detailed in the table below. These will be assessed in Sections 4.2 and 4.3.

Listed Buildings		List UID
Grade II	Hill House	1338418
Grade II	Belvedere House	1306091
Grade II	The Cottage	1113308
Conservation Area	Danbury	

Table 1: Built Heritage Assets that may be affected by the Proposed Development

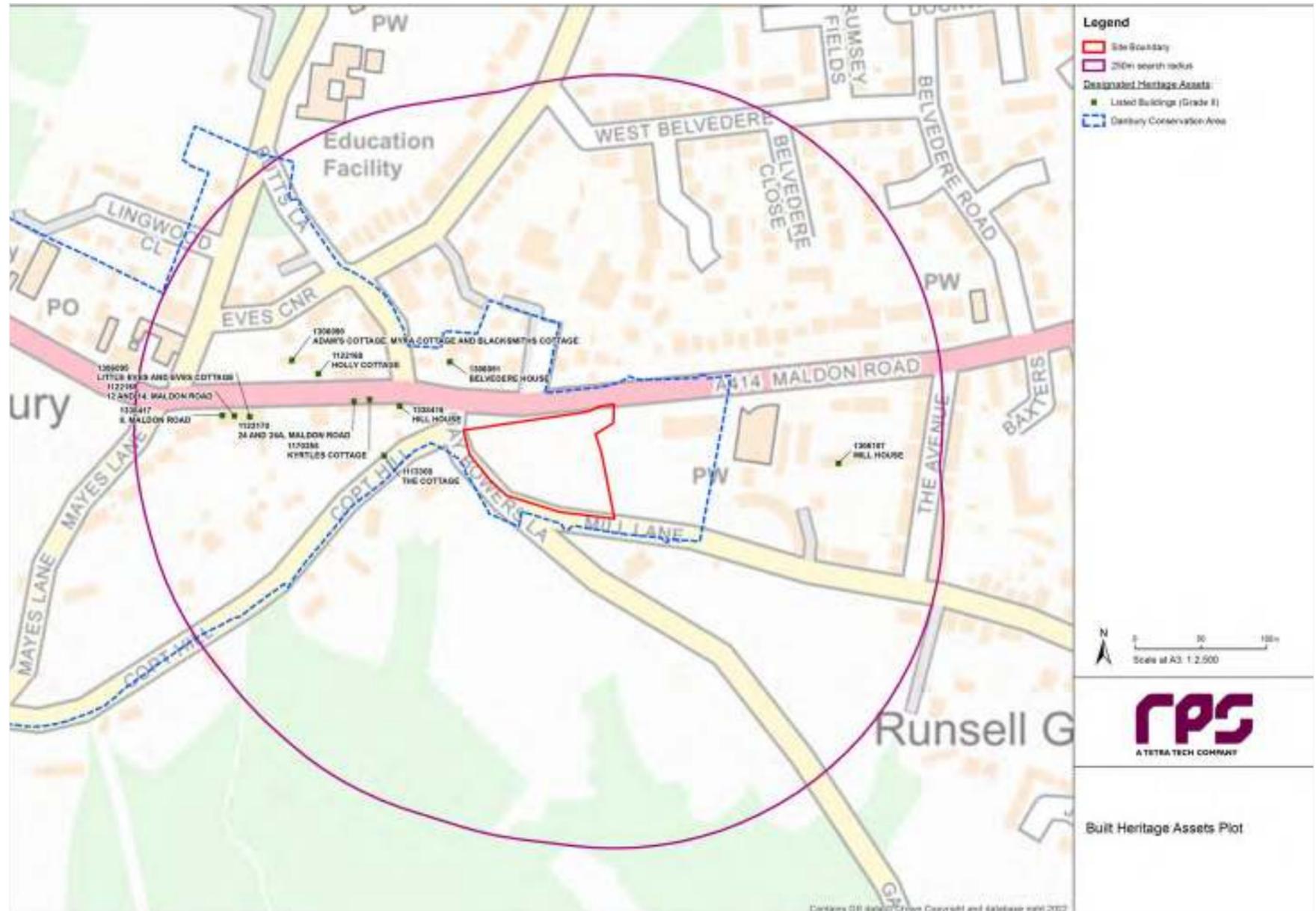


Figure 18: Summary of the Essex Historic Environment Record, illustrating built heritage assets in relation to the Site (outlined in red). (OS mapping: HM Stationery office; Data: Historic England and Essex County Council).

4.0 ASSESSMENT OF SIGNIFICANCE

4.1 SITE ASSESSMENT

The Site sits within the Danbury Conservation Area (DCA) and is known as Bay Green Meadow. Historically, the Meadow extended eastwards and formed the north-eastern boundary of the DCA; however this eastern section was developed with the Danbury Medical Centre, replacing the former Lee House medical facilities.

Land here comprises a large meadow area bounded by a significant numbers of trees, some of which are subject to Tree Preservation Orders, and other vegetation.

It is bounded by Maldon Road to north (the A414 and the principal transport link between the A12, the Dengie Peninsula, Chelmsford and Maldon) Gay Bowers Road to west, Mill Lane to south and the Danbury Medical Centre to east. There is variable and intermittent intervisibility with the surrounding roads and buildings. There is open intervisibility with the medical centre.

This page illustrates images of the Site itself, whilst pages 13 and 14 demonstrate the areas that either surround or are in its proximity.



Figure 19: View across Site east/west from north of Site



Figure 20: View across site west/east from north of Site - open intervisibility with Danbury Medical Centre

Figure 21: View across Site north-west corner to south-east corner.



Figure 22: View east-west from south of Site



Figure 23: View along southern boundary from east of Site



4.1 SITE ASSESSMENT– EXTERNAL VIEWS



Figure 24: View towards Site (enclosed by vegetation) from north –west of Maldon Road



Figure 25: View towards Site from direct north of Maldon Road



Figure 26: View towards Site from north-east of Maldon Road

Figure 27: Proximate buildings located to north of Maldon Road (slight intervisibility with Site)



Figure 28: Danbury Medical Centre located beyond eastern boundary of Site (clear intervisibility with Site) **Figure 29:** View along tree-lined northern boundary of Site with Hill House in distance



4.1 SITE ASSESSMENT - EXTERNAL VIEWS



Figure 30: View towards Site from Gay Bowers Lane, just beyond western boundary of Site



Figure 31: View along Mill Lane east-west, Site's southern boundary to right of image



Figure 32: View along Mill Lane west-east, site's southern boundary to left of image

4.2 DESIGNATED BUILT HERITAGE ASSETS - DANBURY CONSERVATION AREA



Figure 36: View east-west of part of east of DCA in proximity to Site (left behind tree cover). Hill House and group of buildings viewed in distance to rear of green public space



Figure 37: View along deep grass verge to north of Site's boundary to Maldon Road, looking east-west



Figure 38: View of public green at junction of Gay Bowers Lane/Copt Hill

The Danbury Conservation Area was designated in 1973 and amended in 1991.

It has an irregular shape and continuous boundary, generally following the main road to north and then sweeping to south. It includes buildings of historic and architectural interest in addition to modern buildings and open spaces, for example to the rear of the Parish Church of St. John the Baptist, the Dawson Memorial Field, the Community Centre and bowls club. The shape of the DCA is due to the fact that Danbury did not emanate from an historical core, but rather grew along the old main road. The majority of the village centre is included in the designation.

The DPF 2011 acknowledges that *“there seems to be no logical basis in history for the application of the CA or where its boundaries start and finish: in lieu of information to the contrary it would appear that the area within the boundary has been determined somewhat arbitrarily.”*

It also states that *“there are properties which have been excluded (in the DCA) which add significantly to the character of the settlement and whose contribution should be measured by inclusion in the Conservation Area”*.

Significance

The heritage significance of the conservation area lies in the architectural and historical special interest of the fabric and form of the historic buildings

that it contains, the arboreal cover, historic roads/lanes and open visible spaces. As stated by the DPF, there are, properties that add significantly to the settlement's character that have been excluded from the DCA.

The section of the DCA that concerns the Site comprises a combination of historic and modern development, a number of historic roads/lanes, some green open spaces and significant vegetation. Apart from the extremely busy Maldon Road, developed along its frontages, most of the roads/lanes have altered little. Gay Bowers Lane and Mill Lane, that bound the Site to south and west, comprise narrow carriageways of single vehicle width with trees, banks and hedges to their edges, so that there is scarce space for pedestrians. Street lighting is limited as is any other street furniture. Overall these aspects contribute to the local charm of this area. The DPF states that the Bay Green Meadow has valuable open landscape character.

Contribution of Setting to Significance

The setting of the DCA in the area that concerns the Site, either makes a neutral contribution in respect of modern development or a positive contribution to significance in respect of the country lanes, vegetation and green open spaces to south - the latter make a positive contribution only where they are visible, not where there is no awareness of their being.

Contribution of Site to Significance

The Site comprises a large meadow area bounded by a significant

numbers of trees and vegetation. Known as Bay Green Meadow, historically the Meadow extended eastwards and formed the north-eastern boundary of the DCA; however this eastern section has been developed with the Danbury Medical Centre.

After a comprehensive site visit it is considered that the Site makes a neutral contribution only to the DCA for the following reasons:

- There is no awareness of this area of land at all, unless one is visiting the Medical Centre. This applies whether one is walking past the Site along the Maldon Road east-west/west-east or along Gay Bowers and Mill Lanes respectively;
- When at the Medical Centre it is evident that the visitor generally enters and leaves the centre by car, focusing on arrival, departure and the centre itself, not the appreciation of this enclosed open space;
- Historically, the Site was parish land with historic maps evidencing that it was barely enclosed with vegetation. At this time, the Site could be said to be more appreciable and accessible to the village; this is not the case today - the Site is private land and cannot be entered by the public.

4.2 DESIGNATED BUILT HERITAGE ASSETS - DANBURY CONSERVATION AREA



Figure 39: View southwards of public green space from front boundary of Hill House is particularly attractive, providing a village-like feel to this part of the DCA.



Figure 40: View of public green space from front boundary of Hill House, looking south-east



Figure 41: View towards Hill House and modern block of flats from Gay Bowers Lane (Site to right of image, to rear of thick tree boundary)

Figure 42: View southwards along Copt Hill, demonstrating continuation of village-like feel in this part of the DCA



Figure 43: View northwards along Copt Lane demonstrating continuation of village-like feel in this part of the DCA



Figure 44: View northwards along Copt Lane towards group of buildings at Green (modern structures to near left and in far distance)



4.3 DESIGNATED BUILT HERITAGE ASSETS - STATUTORILY LISTED BUILDINGS

Hill House - Grade II

This red brick house is eighteenth century and was once a posting house named The Blue Boar. It is of two storeys with attics, parapet, brick cornice and has 2 flat headed dormers in its tiled roof. The window range is 1:3:1. Between the storeys there is a raised brick band and the window range to centre breaks slightly forward with a pediment. The residence was added to in both the nineteenth and twentieth centuries. .

The property forms a group with Nos 24, 24A and 26 (Kyrtils Cottage) Maldon Road in addition to Adam's Cottage Myra Cottage, Blacksmiths Cottage and Holly Cottage. However, these heritage assets were scoped out from further analysis due to the fact that they have no known associations with the Site, their settings, and thus significance, are not reliant it or because they remain well removed and/or are screened from it, so that there is a lack of intervisibility.

Significance

The heritage significance of Hill House lies in the architectural and historical special interest of its fabric and form, its prominent contribution to the village and conservation area and its group value.

Setting

The house sits to the centre of the village, to the east section of the DCA and is set within private gardens to front and rear; the front garden mostly hidden behind a prominent hedge. A generally residential area surrounds the property, however it does face an open and accessible green space with footpaths, that provides a public area linking Maldon Road, Gay Bowers Lane and Copt Hill. The front elevation of Hill House is prominent when viewed along the Maldon Road, east-west.

Contribution of Setting to Significance

The setting of this built heritage asset makes a positive contribution to its significance in respect of elements of its immediate setting, including the attractive green public open space to fore. However, the extremely busy/noisy A414, to immediate north of the property, makes a negative contribution to its setting and thus significance.

Its extended setting makes a positive contribution to its significance in respect of the numerous trees, other visible vegetation and historic buildings; attractive tree-lined long views are possible from the front elevation of Hill House along the Maldon Road west-east and east-west towards the property. The modern buildings located in its extended setting are considered to make a neutral contribution to its significance.

Contribution of Site to Significance

The Site has no known or legible historical or functional relationship with Hill House and there is extremely limited intervisibility between them, even when viewed in the winter months, as evidenced from photographic



Figure 33: Hill House

Figure 34: Belvedere House



images; it is therefore considered to make a neutral contribution to its setting and thus significance. However, the significant boundary tree cover and other vegetation enclosing the Site, make a positive contribution to the extended setting and thus significance of Hill House.

Belvedere House - Grade II

This 2-storey property consists of a colourwashed brick house of eighteenth century origin. The roof is hipped and tiled and to rear it has a timber-framed/weather-boarded wing. There are double-hung sashes with glazing bars in a 3-window range and the door is of 6-panels set in a wooden doorcase with pilasters. The house has undergone some nineteenth century additions.

Significance

The heritage significance of Belvedere House lies in the architectural and historical special interest of its fabric and form and its positive contribution to this section of the DCA.

Setting

The house sits to the centre of the village and east of the DCA. It is set within private gardens to front and rear; the property is bounded to front by a very tall hedge and it additionally appears to be well screened to rear.

The proximate surrounding area generally comprises residential development, a combination of historic and modern buildings. Belvedere House is not readily visible from Maldon Road, even in winter, as evidenced by figure 34, left.

Contribution of Setting to Significance

The setting of this built heritage asset makes a positive contribution to its setting and thus significance, in respect of elements of its immediate garden setting and vegetation. In respect of its extended setting, the extremely busy/noisy A414, to south, makes a negative contribution due to noise levels, whilst the various surrounding buildings make either a minor positive or neutral contribution to its setting and thus significance. This property is generally considered insular in respect of the overall streetscene.

Contribution of Site to Significance

The Site has no known or legible historical or functional relationship with Belvedere House and there is extremely limited intervisibility between them, even when viewed in the winter months, as evidenced from photographic images; it is therefore considered to make a neutral contribution to its setting and thus significance. However, the significant boundary tree cover and other vegetation enclosing the Site, make a positive contribution to the extended setting and thus significance of the property where these are visible from the property.

4.3 DESIGNATED BUILT HERITAGE ASSETS - STATUTORILY LISTED BUILDINGS

The Cottage - Grade II

This property historically comprised 3 houses that were converted into a single cottage. It combines part of a rendered timber frame of seventeenth century origin; a timber frame clad with brick to the west element; a brick centre; an early eighteenth century centre section; an 1871 rear extension; a west end mid-eighteenth century extension and an 1871 roof extensions of plaintile and slate

Significance

The heritage significance of The Cottage lies in the architectural and historical special interest of its fabric and form and its positive contribution to this section of the DCA.

Setting

The house sits to the centre of the village and to the east section of the DCA. It is set within a small gravel driveway to front and has a rear garden that partially abuts the garden of Hill House; the front of the property is bounded by two brick walls, with two entrances allowing vehicle entrance.

The proximate surrounding area generally comprises residential development, a combination of historic and modern buildings, and very visible vegetation to the far side of Copt Lane. The Cottage is fairly secluded, even though it is fairly close to the main road.

Contribution of Setting to Significance

The setting of this built heritage asset makes a positive contribution to its setting and thus significance, in respect of elements of its immediate garden setting and vegetation, the scenic Copt Lane and the significant vegetation visible to the east of the lane.

In respect of its extended setting, the extremely busy/noisy A414, to north, makes a minor negative contribution due to some noise levels, whilst the various surrounding buildings make either a positive or neutral contribution to its setting and thus significance. The property is fairly secluded and its location can be considered as 'village-like'.

Contribution of Site to Significance

The Site has no known or legible historical or functional relationship with The Cottage. Although they are located in fairly close proximity, there is negligible intervisibility between them, even during the winter months. It is therefore considered to make a neutral contribution to its setting and thus significance. The significant tree cover and other vegetation enclosing the Site make a positive contribution to its extended setting and thus significance where this can be viewed from the property.



Figure 35: The Cottage

5.0 ASSESSMENT

The Site that is being represented to the DRAFT DNP forms part of the Danbury Conservation Area but does not contain any further designated or non-designated built heritage assets. Within a 250 metre search radius there are 10 Grade II listed built heritage assets. It was therefore necessary to ascertain any potential effect development at the Site would have on the conservation area and to the settings, and thus significance, of any built heritage assets in the vicinity. Chelmsford City Council does not maintain a Register of buildings of local value for Danbury.

A comprehensive Site visit established that of the built heritage assets within the 250 metre radius, four required further assessment. The other built heritage assets were scoped out from further analysis due to the following facts: they have no known association with the Site, their settings, and thus significance, are not reliant upon it or they remain well removed and/or are screened from the Site so that there is a lack of intervisibility between them.

The principal considerations are whether any harm could be caused to the significance of the DCA or the statutorily listed buildings (the latter through changes to their respective settings).

Danbury Conservation Area

The DCA was assessed in Section 4.2. It comprises an irregular shape, due to the fact that Danbury did not emanate from an historical core, but grew along the old main road, and includes both historic and modern buildings, visible open spaces and significant vegetation. The heritage significance of the conservation area lies in the architectural and historical special interest of the fabric and form of the historic buildings that it contains, the arboreal cover, historic roads/lanes and open visible spaces.

The DPF states a number of concerns in relation to the DCA including that: *“there seems to be no logical basis in history for the application of the CA or where its boundaries start and finish: in lieu of information to the contrary it would appear that the area within the boundary has been determined somewhat arbitrarily”* and that *“there are properties which have been excluded (in the DCA) which add significantly to the character of the settlement and whose contribution should be measured by inclusion in the Conservation Area”*. We agree with these two statements.

The section of the DCA that concerns the Site comprises a combination of historic and modern development, a number of historic roads/lanes, some green open spaces and significant vegetation. The Site itself comprises a large meadow area bounded by a significant numbers of trees and dense vegetation. Known as Bay Green Meadow, historically the Meadow extended eastwards and formed the north-eastern boundary of the DCA; however this eastern section has been developed with the Danbury Medical Centre.

After a comprehensive visit to the Site and local area, we disagree with references within the DPF that state that Bay Green Meadow is an area of valuable open landscape character that contributes markedly to the open country atmosphere which is such a feature of the village - this may have formerly been the case, as evidenced by historic mapping, but today the Site is barely appreciable and not accessible. As evidenced within the local area, there are readily appreciable open green spaces that do make important contributions to the village, such as the rear of the Parish Church of St. John the Baptist, the Dawson Memorial Field, the Community Centre and bowls club. It is important to note Paragraph 207 of the NPPF which states that *“Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance.”*

The Site is assessed as making a neutral contribution only to this section of the DCA and the DCA overall for the following reasons:

- There is no awareness of this area of land at all, unless one is visiting the Medical Centre. This applies whether one is walking past the Site along the Maldon Road east-west/west-east or along Gay Bowers and Mill Lanes respectively. Additionally, when standing at the junction of Maldon Road and Gay Bowers Lane, there is the overall impression that the north-eastern boundary of the DCA is formed of the significant tree cover provided by the western edge of the Site.
- When at the Medical Centre it is evident that the visitor generally enters and leaves the centre by car, focusing on arrival, departure and the centre itself, not the appreciation of this enclosed open space;
- Historically, the Site was parish land with historic maps evidencing that it was not enclosed with vegetation to the extent that it is today. At this time, the Site could be said to be more appreciable and accessible to the villager; this is not the case today. The Site is private land and cannot be entered by the public.

The Danbury Medical Centre was constructed on part of Bay Green Meadow and was supported by the Parish Council *“as essential, not only to support a sustainable village community in the 21st century, but also to cater for the needs of a growing population arising out of developments such as the Danbury Palace apartment project.”*

The Site itself could also provide development that is:

- Necessary to sustain the local population;
- As part of the required residential allocation of approximately *“100 new homes to be accommodated within or adjoining the Defined Settlement Boundary of Danbury”* as stated by the Chelmsford Local Plan;

- Allow provision for public access, potentially in the form of a green space, in order for the Site to be appreciated as it was historically (This provision is offered on condition that it is essential and would be subject to planning).
- Ensure green spaces on the Site (potentially private garden(s)).

Any proposals would need to demonstrate that they:

- Conserve and enhance the character of the DCA;
- Respect the quality of local character, including the natural environment;
- Introduce development that is sympathetic to the DCA and its surroundings in both design and physical terms (for example size);
- Utilise preferably natural materials that pay regard to both the DCA and local character;
- Reduce the limited intervisibility between the Site and surrounding roads/lanes by introducing further complementary planting into its extant boundary;
- Ensure that where a boundary is necessary between the Site and the Danbury Medical Centre, this is naturally delineated, for example by hedging.

Statutorily listed built heritage assets

In order to determine whether there would be any impact to the settings, and thus significance, of the built heritage assets assessed within the document, due to intervisibility with the Site, this section references the *Historic Environment Good Practice Advice in Planning, Note 3: The Setting of Heritage Assets (HEGPA3) (December 2017)*. This GPA sets out a 5-step process which assesses the potential effects of a proposed development on the setting and thus significance of a heritage asset.

Step 1 - Identify which heritage assets and their settings are affected

This identification was enabled through reference to the Essex Historic Environment Record, as illustrated in Section 3.3, page 11 of this Report, in addition to Historic England's National Heritage List for England. Built heritage assets that may be affected by the Proposed Development are detailed in Table 1, page 11.

Step 2 - Assess the degree to which these settings and views make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated

The significance of the built heritage assets and the contribution that their settings make to their significance was assessed in Section 4.3 and is summarised as follows:

5.0 ASSESSMENT

Hill House - Immediate setting - positive contribution excluding the A414. Extended setting - positive in respect of numerous trees, other visible vegetation and historic buildings; neutral in respect of modern buildings. Contribution of Site to Significance - neutral, apart from boundary tree cover which is positive.

Belvedere House - Immediate setting - positive contribution. Extended setting - A414 negative, various surrounding buildings either minor positive or neutral. This property is generally considered insular in respect of the overall streetscene. Contribution of Site to significance - neutral, apart from boundary tree cover which is positive.

The Cottage - Immediate setting - positive contribution. Extended setting - A414 minor negative, surrounding buildings positive/neutral. Contribution of Site to significance - neutral, boundary tree cover positive where it is visible.

Step 3 - Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it

This BHA supports representations on behalf of Medical Services Danbury Ltd. to the Neighbourhood Plan and as yet no draft details of proposals are available. It is, though, assessed that development could be introduced into the Site as this has been found to make a neutral contribution only to this section of the DCA, the DCA overall and the statutorily listed buildings in the vicinity, with which there is a lack of intervisibility.

Step 4 - Explore ways to maximise enhancement and avoid or minimise harm

Any proposals should:

- Respect the quality of local character, including the natural environment;
- Introduce development that is sympathetic to the built heritage assets and local environment in both design and physical terms, such as size. There is no predominate style of architecture within the village, but the overall appearance is traditional. However, the DPF states that: *“notwithstanding the overall traditional and rural feel to the village, modern buildings are not unwelcome provided the contribution made to the architectural stock is complementary and beneficial in terms of design and architectural merit, materials used, sustainability, contribution to the character of the village and the acceptability of setting relative to immediate neighbours. New buildings present the opportunity to introduce new and innovative technology which is beneficial to the environment and this is to be welcomed.”*
- Utilise preferably natural materials that pay regard to built heritage

assets and local character;

- Reduce the limited intervisibility between the Site and surrounding roads/lanes by introducing further complementary planting into its extant boundary. This would also increase the positive setting, and thus significance, that the Site boundary contributes to the built heritage assets;
- Ensure attractive landscaping within the Site;
- Ensure that where a boundary is necessary between the Site and the Danbury Medical Centre, this is naturally delineated, for example by hedging.

Step 5 - Make and document the decision and monitor outcomes

This step is outside of the remit of this Built Heritage Assessment.

6.0 CONCLUSIONS

This Built Heritage Assessment has been researched and prepared by RPS on behalf of Medical Services Danbury Ltd. in order to support their representations to the Neighbourhood Plan in respect of Land at Maldon Road, Danbury.

The Site forms a small section of the designated Danbury Conservation Area but does not contain any further designated or non-designated built heritage assets. Within a 250 metre search radius lie 10 designated built heritage assets.

It was established that four built heritage assets required further assessment with the principal considerations being whether any harm could be caused to the significance of the DCA or the statutorily listed buildings (the latter through changes to their respective settings) if the Site were developed.

After further analysis it was concluded that:

- The Site makes a neutral contribution only to this section of the DCA and the DCA overall;
- Development introduced into the Site would cause no harm to either the DCA or the statutorily listed buildings if the recommendations outlined are carefully incorporated into design and materials;
- The Site could make an extremely positive contribution to supporting the village community and its growing population;
- Provision for public access to the Site, potentially in the form of a green space, would allow this neglected space to be appreciated. (Provision offered if essential and would be subject to planning).

6.0 REFERENCES

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Promap

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AH001

Report to:

**Chelmsford
City Council**

**Strategic Housing
Needs Assessment**

Final Report

October 2023

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Summary

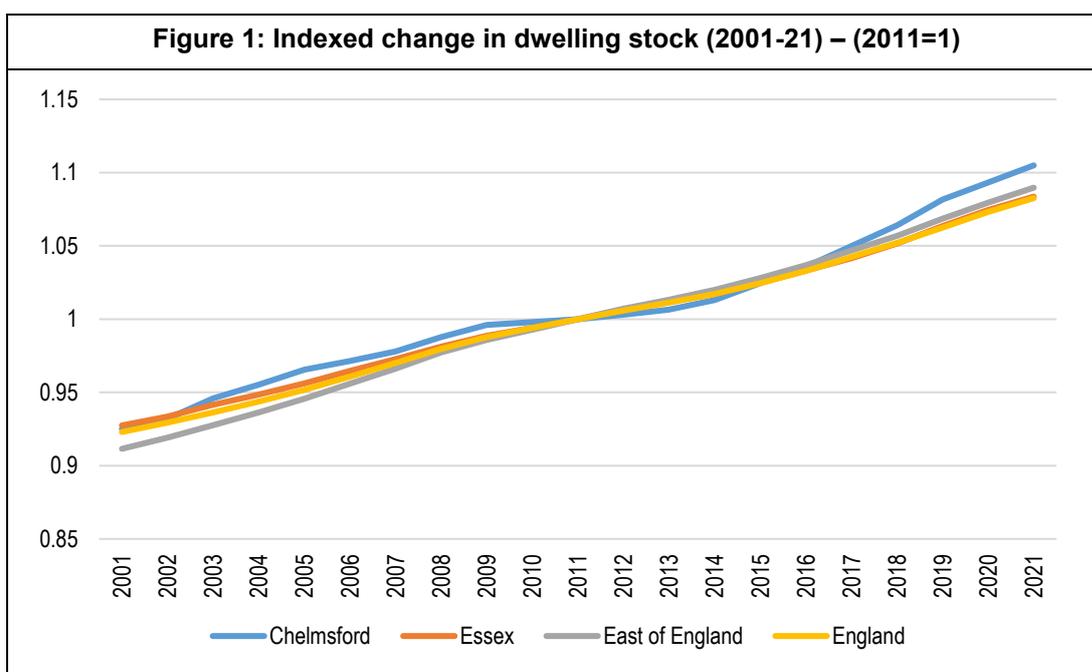
Background

1. This report provides a new Strategic Housing Needs Assessment (SHNA) for Chelmsford City Council. This report focusses on overall housing need, including consideration of the Standard Method as well as looking at affordable housing in the context of changing Government policy (including in relation to First Homes) and the needs of specific groups such as older people.
2. The study follows the approach set out in the latest published National Planning Policy Framework (NPPF) and supporting Planning Practice Guidance (PPG) and uses the latest available demographic data from the Office for National Statistics (ONS) and a range of other available datasets to provide a contextual picture and analysis of the housing market for the Council's administrative area.
3. To understand the area, an initial phase of work was carried out to talk with key players in the housing market (including estate and letting agents). From this, agents noted the private rented sector in Chelmsford, like most other parts of the country, cannot deliver the supply needed and that this is particularly acute in Chelmsford due to the scale of out-migration from London. Additionally, both registered providers and the County Council highlighted delivery of extra-care housing for older people as a particular issue and this is picked up later in this report.
4. Overall, the report sets out a number of either linked or distinct sections to cover a range of core subject areas; the sections are summarised below:
 - Section 2 – Area Profile;
 - Section 3 – Overall Housing Need;
 - Section 4 – Affordable Housing Need;
 - Section 5 – Housing Mix;
 - Section 6 – The Needs of Older People and People with Disabilities;
 - Section 7 – Private Rented Sector; and
 - Section 8 – Other Groups

Area Profile

5. Analysis was carried out to provide background information about population and housing in Chelmsford. Data is compared with local, regional and national data as appropriate. The analysis can be summarised as covering three main topic headings:
 - Demographic baseline (including data on population age structure and changes);
 - Housing stock (including type and tenure); and
 - Housing market (including data on house prices)

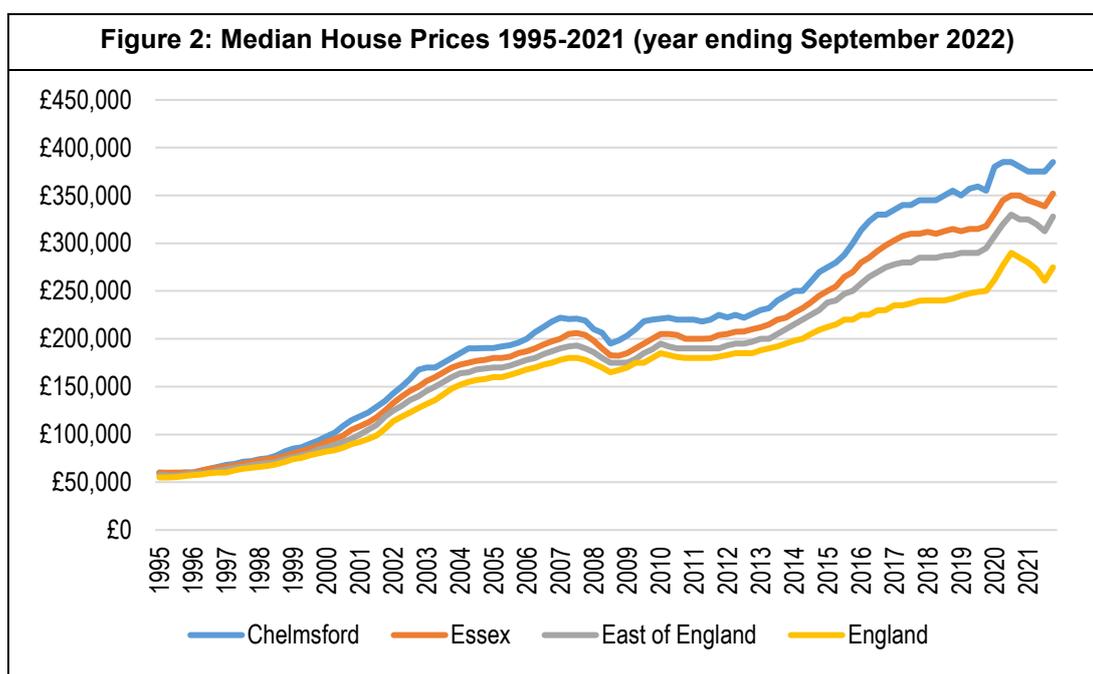
6. As of mid-2021, the population of Chelmsford is 181,800 and since 2011 the City Council area population has grown by around 8% which is a similar rate of growth as across Essex and the east of England, but a slightly faster rate than nationally. The City Council area also saw a similar level of population growth in the 2001-2011 period.
7. The age structure of the population is also slightly different to other areas, with fewer people aged in their late teens and early 20s, and higher proportions in their late 30s and 40s. Over the past decade, the City Council area has seen an ageing of the population, with the number of people aged 65 and over increasing by 24%; there have however also been increases in the number of children and people of 'working-age' (taken to be 16-64).
8. Population growth in the City Council area is largely driven by internal migration – moves from one part of the UK to another, although there are also generally positive levels of natural change (births minus deaths) and international migration.
9. ONS dwelling stock data indicates there were 78,700 dwellings in the City Council area as of 2021, a net increase of 7,500 dwellings between 2011 and 2021. Rates of change in dwelling numbers have been in excess of that seen in other areas, and particularly the last 4-5 years.



Source: DLUHC

10. Some 71% of all households in the City Council area are owner-occupiers, notably higher than the national average of 62% (and higher than other benchmark areas), consequently the proportion of households living in the social rented (13%) and private rented (16%) sectors is lower than seen in other locations.

11. The housing stock sees a relatively high proportion of detached homes, making up 30% of all dwellings (23% nationally) and related to this the stock is generally larger in nature, with around 29% having 4+-bedrooms. Again linked to this, the City Council area sees high levels of under-occupancy, with 42% of all households living in homes with at least two spare bedrooms. Levels of overcrowding are relatively low – at just 2.7% of all households.
12. In the year to September 2022 the median house price in Chelmsford was £385,000. This is significantly above the median house price for comparator areas, and is 40% above the national average. Prices have also been increasing significantly, rising by 71% (£160,000) over the decade to September 2022. Over the past five years price rises have been more modest, increasing by 17%. When looking at median prices by property type, Chelmsford also typically sees higher prices for different types of property than Essex, the East of England region and England as a whole.



Source: Land Registry

13. As well as higher house prices, the City Council area typically sees higher private rental costs, with the median private rent for a 2-bedroom home standing at £1,000 per month in the year to September 2022. Rents overall are around 24% above the national average (compared with 40% when looking at median house prices). Over the past five years rents have increased by around 33%, higher than the increase in house prices over the same period.
14. In line with national trends, affordability in the City Council area has worsened with the workplace based median affordability ratio in Chelmsford at 12.21 in 2022 – this is based on the ratio between median house prices and full-time earnings.
15. Overall, the data points to Chelmsford as an affluent area with higher house prices and large proportions of households living in owner-occupied housing. The City Council area also sees a housing mix of larger and detached homes. The analysis points to relatively high levels of housing demand. This can be seen in analysis of house prices and strong levels of delivery.

16. That said, there are clearly issues suggested by the data. The house price to income ratio is high, pointing to potential difficulties in first-time-buyers (in particular) accessing the market – private rents are also high. At the same time, the relative lack of social rented housing means it will be difficult for the Council to meet affordable housing needs when they arise.

Overall Housing Need

17. The SHNA studied the overall housing need set against the NPPF and the framework of PPG – specifically the Standard Method for assessing housing need. This shows a need for 955 dwellings per annum. This is based on household growth of 631 per annum and an uplift for affordability of 51%.

Figure 3: Standard Method Housing Need Calculations using 2014-based Household Projections	
	Chelmsford
Households 2023	78,037
Households 2033	84,351
Change in households	6,314
Per annum change	631
Affordability ratio (2022)	12.21
Uplift to household growth	51%
Uncapped need (per annum)	955

Source: Derived from DLUHC and ONS data

18. The report has considered whether there are exceptional circumstances to move away from the Standard Method (either in an upward or downward direction). This looked at up-to-date demographic trends and is also mindful of the NPPF consultation of December 2022 which points to there being some strengthening of the encouragement for local authorities to consider exceptional circumstances. The consultation NPPF suggests that consideration will be given to 2021-based projections when these are published in 2024.
19. The report looks at more recent demographic trends – taking account of 2021 Census data and ONS mid-year population estimates up to 2021, this data was compared with the 2014-based projections. Whilst there were differences between sources, these were not considered to be substantial and did not point to any exceptional circumstances.
20. Data about household growth from the Census also showed a similar pattern to that in the 2014-based projections, again pointing to the projections underpinning the Standard Method as remaining reasonable.
21. Past build rates were also considered as areas with strong growth might be able to provide more homes than the Standard Method (also high delivery might point to an over-supply of housing). In Chelmsford, whilst delivery has been strong, averaging approaching 814-958 dwellings per annum over the past 5- and 10-years it is again not considered that this provides any evidence to suggest a higher or lower figure than the Standard Method.

22. As a final test on exceptional circumstances, the Standard Method projection was used to look at potential changes to the resident labour supply and the number of additional jobs that might be supported. Overall, it was projected the labour supply would increase by around 21% over the 2022-41 period and that this could support around 21,000 additional jobs – this is above an economic forecast (just over 12,400 jobs for the same period) and again points to there being no need to plan for housing in addition to the Standard Method.
23. Overall, it was therefore concluded that the Standard Method is a reasonable assessment of housing need for Chelmsford (noting the premise of the method itself has not been challenged in this report). On that basis a bespoke demographic projection was developed to look at how the population might change if 955 homes per annum were delivered over the 2022-41 period. This showed continued strong population growth and an ageing of the population, although an increase in the number of children and those of ‘working-age’ is also projected.

Affordable Housing Need

24. Analysis has been undertaken to estimate the annual need for affordable housing. The analysis is split between a need for social/affordable rented accommodation (based on households unable to buy or rent in the market) and the need for affordable home ownership (AHO) – this includes housing for those who can afford to rent privately but cannot afford to buy a home.
25. The analysis has taken account of local housing costs (to both buy and rent) along with estimates of household income. Additionally, when looking at rented needs, consideration is given to estimates of the supply of social/affordable rented housing. For AHO, consideration is given to the potential supply of resales of low-cost home ownership properties (such as shared ownership) and lower quartile sales of existing homes.
26. When looking at needs from households unable to buy OR rent, the analysis suggests a need for 623 affordable homes per annum across the City Council area – a need is shown in all parts of the Council area.

Figure 4: Estimated Need for Social/Affordable Rented Housing by sub-area (per annum)

	Current need	Newly forming households	Existing households falling into need	Total Gross Need	Relet Supply	Net Need
Urban	23	415	100	538	156	382
Rural	5	226	31	262	70	192
South Woodham Ferrers	2	44	11	57	8	48
TOTAL	30	685	142	857	234	623

Source: Affordable Housing Need analysis (see Section 4)

27. Despite the level of need being high in relation to the Standard Method, it is not considered that this points to any requirement for the Council to increase the Local Plan housing requirement due to affordable needs. The link between affordable need and overall need (of all tenures) is complex and in trying to make a link it must be remembered that many of those picked up as having an affordable need are already in housing (and therefore do not generate a net additional need for a home). That said, the level of affordable need does suggest the Council should maximise the delivery of such housing at every opportunity.
28. The analysis suggests there will be a need for both social and affordable rented housing – the latter will be suitable particularly for households who are close to being able to afford to rent privately and possibly also for some households who claim full Housing Benefit. It is however clear that social rents are more affordable and could benefit a wider range of households – social rents could therefore be prioritised where delivery does not prejudice the overall delivery of affordable homes. Increasing in the number of people living in temporary accommodation also points to the need for social rented housing ahead of other tenures.
29. When looking at AHO products, the analysis is inconclusive about the scale of the need. Although the evidence does suggest that there are many households in Chelmsford who are being excluded from the owner-occupied sector (as evidenced by increases in the size of the private rented sector). It is likely that a key issue in the City Council area is about access to capital (e.g. for deposits, stamp duty, legal costs) as well as potentially mortgage restrictions (e.g. where employment is temporary) rather than simply the cost of housing to buy.
30. The study also considers different types of AHO (notably First Homes and shared ownership) as each will have a role to play – shared ownership is likely to be suitable for households with more marginal affordability (those only just able to afford to privately rent) as it has the advantage of a lower deposit and subsidised rent.
31. However, given the cost of housing locally, it seems very difficult for affordable home ownership products to be provided and be considered as ‘genuinely affordable’. This again points to the need for the Council to prioritise delivery of rented affordable housing where possible.
32. In deciding what types of affordable housing to provide, including a split between rented and home ownership products, the Council will need to consider the relative levels of need and also viability issues (recognising for example that providing AHO may be more viable and may therefore allow more units to be delivered, but at the same time noting that households with a need for rented housing are likely to have more acute needs and fewer housing options).
33. Overall, the analysis identifies a notable need for affordable housing, and it is clear that provision of new affordable housing is an important and pressing issue in the area. It does however need to be stressed that this report does not provide an affordable housing target; the amount of affordable housing delivered will be limited to the amount that can viably be provided. The evidence does however suggest that affordable housing delivery should be maximised where opportunities arise.

Housing Mix

34. Analysis of the future mix of housing required takes account of demographic change, including potential changes to the number of family households and the ageing of the population. The proportion of households with dependent children in Chelmsford is fairly average with around 29% of all households containing dependent children in 2021 (compared with around 28% regionally and 29% nationally). There are notable differences between different types of household, with married couples (with dependent children) seeing a high level of owner-occupation, whereas as lone parents are particularly likely to live in social or private rented accommodation.
35. There are a range of factors which will influence demand for different sizes of homes, including demographic changes; future growth in real earnings and households' ability to save; economic performance and housing affordability. The analysis linked to future demographic change concludes that the following represents an appropriate mix of affordable and market homes, this takes account of both household changes and the ageing of the population – the analysis also models for there to be a modest decrease in levels of under-occupancy (which in Chelmsford is notable in the market sector).
36. In all sectors the analysis points to a particular need for 2-bedroom accommodation, with varying proportions of 1-bedroom and 3+-bedroom homes. For rented affordable housing there is a clear need for a range of different sizes of homes, including 40% of general needs housing to have at least 3-bedrooms. Our recommended mix is set out below:

Figure 5: Suggested size mix of housing by tenure – Chelmsford				
	Market	Affordable home ownership	Affordable housing (rented)	
			General needs	Older persons
1-bedroom	5-10%	25%	25%	55%
2-bedrooms	30-35%	45%	35%	45%
3-bedrooms	35-40%	25%	30%	
4+-bedrooms	20-25%	5%	10%	

Source: Housing Mix analysis (see Section 5)

37. The strategic conclusions in the affordable sector recognise the role which delivery of larger family homes can play in releasing a supply of smaller properties for other households. Also recognised is the limited flexibility which 1-bedroom properties offer to changing household circumstances, which feed through into higher turnover and management issues. The conclusions also take account of the current mix of housing by tenure and also the size requirements shown on the Housing Register.
38. The mix identified above could inform strategic policies although a flexible approach should be adopted. For example, in some areas Registered Providers find difficulties selling 1-bedroom affordable home ownership (AHO) homes and therefore the 1-bedroom elements of AHO might be better provided as 2-bedroom accommodation. That said, this report also highlighted potential difficulties in making (larger) AHO genuinely affordable.

39. Additionally, in applying the mix to individual development sites, regard should be had to the nature of the site and character of the area, and to up-to-date evidence of need as well as the existing mix and turnover of properties at the local level. The Council should also monitor the mix of housing delivered.
40. Given the nature of the area and the needs identified, the analysis suggests that units would comprise a mix of both houses and flats although consideration will need to be given to site specific circumstances (which may in some cases lend themselves to a particular type of development). There is potentially a demand for bungalows, although realistically significant delivery of this type of accommodation may be unlikely. It is however possible that delivery of some bungalows might be particularly attractive to older person households downsizing and may help to release larger (family-sized) accommodation back into family use.

Older and Disabled People

41. A range of data sources and statistics have been accessed to consider the characteristics and housing needs of the older person population and the population with some form of disability. The two groups are taken together as there is a clear link between age and disability. The analysis responds to Planning Practice Guidance on Housing for Older and Disabled People published by Government in June 2019 and includes an assessment of the need for specialist accommodation for older people and the potential requirements for housing to be built to M4(2) and M4(3) housing technical standards (accessibility and wheelchair standards).
42. The data shows that Chelmsford has a similar age structure to other areas in terms of the proportion of older people. The older person population shows high proportions of owner-occupation, and particularly outright owners who may have significant equity in their homes (79% of all older person households are outright owners).
43. The older person population is projected to increase notably moving forward. An ageing population means that the number of people with disabilities is likely to increase substantially. Key findings for the 2022-41 period include:
- a 35% increase in the population aged 65+ (potentially accounting for 36% of total population growth);
 - a 52% increase in the number of people aged 65+ with dementia and a 44% increase in those aged 65+ with mobility problems;
 - a need for around 770 housing units with support (sheltered/retirement housing) – all within the market sector;
 - a need for around 750 additional housing units with care (e.g. extra-care) – the majority (around 70%) in the market sector;
 - a need for additional residential and nursing care bedspaces (around 890 in the period); and
 - a need for up to 1,060 dwellings to be for wheelchair users (meeting technical standard M4(3)).

44. This would suggest that there is a clear need to increase the supply of accessible and adaptable dwellings and wheelchair user dwellings as well as providing specific provision of older persons housing. Given the evidence, the Council could consider (as a start point) requiring all dwellings (in all tenures) to meet the M4(2) standards and around 5% of homes meeting M4(3) – wheelchair user dwellings in the market sector (a higher proportion of around 10% in the affordable sector).
45. Where the authority has nomination rights M4(3) would be wheelchair accessible dwellings (constructed for immediate occupation) and in the market sector they should be wheelchair user adaptable dwellings (constructed to be adjustable for occupation by a wheelchair user). It should however be noted that there will be cases where this may not be possible (e.g. due to viability or site-specific circumstances) and so any policy should be applied flexibly.

Private Rented Sector

46. The private rented sector (PRS) accounts for around 16% of all households in Chelmsford (as of 2021) – a smaller proportion to that seen across the East of England, and below the national average (20%). The number of households in this sector has however grown substantially (increasing by 40% in the 2011-21 period).
47. The PRS has some distinct characteristics, including a much younger demographic profile and a high proportion of households with dependent children (notably lone parents) – levels of overcrowding are relatively high. In terms of the built-form and size of dwellings in the sector, it can be noted that the PRS generally provides smaller accommodation when compared with the owner-occupied sector. That said, around 37% of the private rented stock has three or more bedrooms and demonstrates the sector's wide role in providing housing for a range of groups, including those claiming Housing Benefit and others who might be described as 'would be owners' and who may be prevented from accessing the sector due to issues such as deposit requirements.
48. Additional analysis suggests that rent levels have increased over time (when looking at the 2012-22 period) but that increases in rents fall behind the increase in house prices over the same period. Increases in both rents and house prices have been in excess of the growth in earnings over the same period and arguably points to a shortage of private rented accommodation. The lack of homes to buy does appear to be a more pressing issue.
49. This study has not attempted to estimate the need for additional private rented housing. It is likely that the decision of households as to whether to buy or rent a home in the open market is dependent on a number of factors which mean that demand can fluctuate over time; this would include mortgage lending practices and the availability of Housing Benefit. A general (national and local) shortage of housing is likely to have driven some of the growth in the private rented sector, including increases in the number of younger people in the sector, and increases in shared accommodation. If the supply of housing increases, then this potentially means that more households would be able to buy, but who would otherwise be renting.

50. That said, the Council could be supportive of new private rented sector housing (including Built-to-Rent) where this can be seen to be of higher quality and potentially providing a housing offer that does not exist in any great quantity. Stock conditions in the PRS are generally worse than in other sectors and BtR housing could help to improve this situation. In addition, the age of tenants in the sector seems to be getting slightly older, and may contain more households with higher incomes. There may also be a market for essential local (key) workers due to income levels typically sitting between buying and renting a home.
51. If accepting proposals for BtR it will however be important for the Council to ensure reasonable deliver of affordable housing. It is recommended the Council investigates targets in excess of 20% (which is the benchmark set out in PPG) and also to set rent levels at no more than the relevant Local Housing Allowance (to ensure homes are 'genuinely affordable'). The mix of homes to be developed will also need to be monitored with the evidence pointing to the main needs being likely to be smaller family sized dwellings (2- and 3-bedroom) and also smaller dwellings for single people and childless couples (1- and 2-bedroom).

Other Groups

52. The final part of the report looked briefly at two specific groups in the population. Firstly those people wishing to commission or build their own homes (self- and custom-build housing) and secondly to review the potential need for accommodation for children in need of social services care following a Ministerial Statement in May 2023.
53. As of 1st April 2016, and in line with the 2015 Act and the Right to Build, relevant authorities in England are required to have established and publicised a self-build and custom housebuilding register which records those seeking to acquire serviced plots of land in the authority's area in order to build their own self-build and custom houses.
54. To help meet the demand for self- and custom-build housing the Council has Local Plan Policy DM1 which states that within developments of 100 dwellings or more, the Council will require 5% of dwellings to be self/custom build. Data from the Council suggests that the demand has successfully been met with enough suitable permissions before the relevant deadlines. On that basis, it is suggested the Council continues with their current approach to custom- and self-build housing.
55. In a Written Ministerial Statement (WMS) made in May 2023, the Housing and Planning Minister reminded local authorities of their requirement to assess the housing need of different groups in the community including "accommodation for children in need of social services care". The WMS statement said "Local planning authorities should give due weight to and be supportive of applications, where appropriate, for all types of accommodation for looked after children in their area that reflect local needs and all parties in the development process should work together closely to facilitate the timely delivery of such vital accommodation for children across the country.
56. Across Essex and Chelmsford, the proportion of children in care (CiC) is low in a national context; 21.6 per 10,000 children in Chelmsford, 34 per 10,000 across Essex and 67 per 10,000 nationally. The majority of CiC in Essex are in foster care (68%) with only 8% in residential care.

57. Using the Chelmsford prevalence rate and linking to demographic projections it is estimated the number of CiC would increase by 11 in the period to 2041 and this does not point to any significant additional need in the future although the Council should monitor numbers as it is likely these can fluctuate over time (including due to the influence of separated migrant children).
58. If additional supply for children is required, the Council could seek to include such accommodation as part of wider, appropriately located, housing developments and could be covered by Policy DM1C – Specialist Residential Accommodation. This might be in the form of 3-4 bedroom “ordinary homes” and could be managed by a combination of the County Council and through external providers.

Overall Summary

59. Chelmsford has characteristics of an affluent area, including high house prices and a high proportion of households living in owner-occupied housing. However, the high house prices (also when considered relative to local incomes) and the general lack of social rented housing does point to potential affordability and the need for affordable housing.
60. The Standard Method for shows a housing need for 955 dwellings per annum in the City Council area. This figure looks to be reasonable and there are no exceptional circumstances pointing towards a higher or lower figure - this conclusion takes account of up-to-date demographic trends.
61. There is a significant need for affordable housing, particularly for lower income households likely to need rented accommodation. The Council should prioritise delivery of social rented housing where it is viable to do so. There is also a potential need for affordable home ownership, although it seems difficult to make such homes genuinely affordable in a local context, thus lending further support for the provision of rented, and particularly social rented housing.

1. Background

Introduction

- 1.1 Justin Gardner Consulting (JGC) in association with CNB Housing Insights were commissioned to carry out a new Strategic Housing Needs Assessment (SHNA) for Chelmsford City Council. This report focusses on overall housing need, including consideration of the Standard Method as well as looking at affordable housing in the context of changing Government policy (including in relation to First Homes) and the needs of specific groups such as older people.
- 1.2 The Council is in the process of reviewing the evidence base for the new Local Plan and on that basis a key purpose of the study is to assess how many, and determine the types of, homes that need to be planned for to ensure that the Local Plan remains up to date and continues to meet changing needs.
- 1.3 The study follows the approach set out in the latest published National Planning Policy Framework (NPPF) and supporting Planning Practice Guidance (PPG) and uses the latest available demographic data from the Office for National Statistics (ONS) and a range of other available datasets to provide a contextual picture and analysis of the housing market for the Council's administrative area.

National Policy Context

- 1.4 The sub-sections below set out an overview of the key national planning policy and guidance in relation to housing need before moving on to look at proposed changes where these are relevant to this study.

NPPF – July 2021

- 1.5 The latest version of the National Planning Policy Framework (NPPF) was published by Government on 20th July 2021. Paragraph 7 in the NPPF states that the purpose of planning is to contribute to the achievement of sustainable development. It sets out that planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.
- 1.6 The development plan must include strategic policies to address Council's priorities for the development and use of land in its area. Plans should apply a presumption in favour of sustainable development and for plan-making, this means that the plan should positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change and strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring authorities, where it is sustainable to do so.

- 1.7 Paragraph 11 reiterates that “strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring area, unless...the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area”.
- 1.8 In order to support the Government’s objective of significantly boosting the supply of homes, Paragraph 60 in the NPPF states it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.
- 1.9 Paragraph 61 sets out that in order to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.
- 1.10 Paragraph 62 goes on to set out that within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, people who rent their homes and people wishing to commission or build their own homes.
- 1.11 Paragraphs 63 – 65 address affordable housing provision. They set out that where an affordable housing need is identified, planning policies should specify the type of affordable housing required and expect it to be met on-site unless off-site provision or a financial contribution in lieu can be robustly justified, or the agreed approach contributes to the objectives of creating mixed and balanced communities.

Planning Practice Guidance

- 1.12 Government’s Planning Practice Guidance (PPG) includes several sections which are relevant to the assessment of housing need. Guidance on Housing and economic needs assessments explains that housing need is “an unconstrained assessment of the number of homes needed in an area” and should be undertaken separately from assessing land availability, establishing a housing requirement figure and preparing policies to address this such as site allocations.
- 1.13 The PPG explains that policy-making authorities are expected to follow the Standard Method for assessing housing need and that the method is designed to identify the minimum number of homes expected to be planned for, addressing both projected household growth and historical under-supply.

- 1.14 The guidance does however note that the use of the standard method for strategic policy making purposes is not mandatory but that alternative methods should only be used in exceptional circumstances and will be tested at examination. Where an authority uses an approach leading to a lower housing need figure than that identified using the standard method, the strategic policy-making authority will need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances that justify deviating from the standard method. This will be tested at examination. The PPG also notes that any method which relies on using household projections more recently published than the 2014-based household projections will not be considered to be following the standard method.
- 1.15 The current guidance is therefore quite clear: there is an expectation that the 2014-based sub-national household projections (SNHP) should be used but that an alternative approach can be used. When using an alternative approach, it is necessary to take account of demographic growth and market signals, but this cannot include using more recent versions of published SNHP. On their own these would not currently constitute exceptional circumstances.
- 1.16 Guidance in Housing Needs of Different Groups sets out how affordable housing need can be assessed, as well as the needs of students, and how planning policies can support rural communities. It makes clear that the housing needs of individual groups may well exceed, or be proportionally high in relation to, the overall housing need figure calculated using the standard method, as these will often be calculated having consideration to the whole population as opposed to new households.
- 1.17 The Council will need to take into account these needs including the need for affordable housing - having regard to the overall housing need identified, the extent to which this can be translated into a housing requirement figure over the plan period, and the anticipated deliverability of different forms of provision, having regard to viability.
- 1.18 The Guidance section for Housing for Older and Disabled people describes the need to provide housing for older people as critical, as people are living longer, and the older population is increasing. It sets out that the health, lifestyle and housing needs of older people will differ greatly with housing needs ranging from accessible and adaptable general needs housing to specialist housing with high levels of care and support.
- 1.19 It provides guidance on how the housing needs of older and disabled people can be assessed, and sets out that this should inform clear policies within plans which may include specific site allocations to provide greater certainty to developers. Separate guidance is provided on optional technical standards including for accessible and adaptable housing, use of national space standards and wheelchair-accessible housing.
- 1.20 Separate guidance sections have also been prepared which address Build to Rent and Self-Build and Custom Housebuilding. The Build-to-Rent Guidance requires authorities to assess need, and where a need is identified to include a plan policy setting out the circumstances and locations where build-to-rent development will be encouraged.

- 1.21 The Self-Build Guidance section sets the requirements of the Self-Build and Custom Housebuilding Act 2015 (as amended) including the requirements on Councils to maintain a Register of those interested in self-build housing and to grant consents to meet the need shown. It also sets out that needs assessments can consider other secondary data sources.

NPPF – Consultation (December 2022)

- 1.22 On the 22nd December 2022 the DLUHC published a new draft NPPF for consultation. This document clearly shows the Government's direction of travel in terms of planning policy and includes a number of proposals which may be relevant to Chelmsford.

- 1.23 In paragraph 11 dealing with the presumption in favour of sustainable development additional text has been added to criteria b(ii) along with a new b(iii). The underlined text below shows the proposed changes.

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.; such adverse impacts may include situations where meeting need in full would mean building at densities significantly out of character with the existing area

iii: there is clear evidence of past over-delivery, in terms of the number of homes permitted compared to the housing requirement in the existing plan.; in which case this over-delivery may be deducted from the provision required in the new plan.

- 1.24 Under 'Examining Plans' (notably paragraph 35) it is proposed that Local Plans should be positively prepared – *'providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs so far as possible, taking into account the policies in this Framework'*. The same paragraph sees a watering down of the tests of soundness by removing the requirement for plans to be justified.

- 1.25 Section 5 of the consultation NPPF deals with 'Delivering a sufficient supply of homes' and contains a number of proposed changes.

Para 60 - The overall aim should be to meet as much housing need as possible with an appropriate mix of housing types to meet the needs of communities

Para 61 - The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area (see paragraph 67 below). There may be – unless exceptional circumstances relating to the particular characteristics of an authority which justify an alternative approach to assessing housing need; in which case the alternative used which should also reflect current and future demographic trends and market signals.

- 1.26 Finally, in Section 13 'Protecting Green Belt Land' Green Belt boundaries are not required to be reviewed and altered if this would be the only means of meeting the objectively assessed need for housing over the plan period.

- 1.27 An accompanying Scope of Consultation document published alongside the consultation NPPF includes some additional information about the direction of travel. Most notable for this project is the suggestion that future estimates of housing need could move away from using the 2014-based subnational household projections (SNHP). Specifically the text says:

The standard method for assessing local housing need was introduced in 2018 to make sure that plan-making by local authorities is informed by an objective assessment of projected household growth and affordability pressures, while speeding up the process of establishing housing requirement figures through local plans. It remains important that we have a clear starting point for the plan-making process and we are not proposing any changes to the standard method formula itself through this consultation. However, we will review the implications on the standard method of new household projections data based on the 2021 Census, which is due to be published in 2024.

- 1.28 There is also additional text about being more flexible in the use of the Standard Method. Under the heading of Using an Alternative Method the document states:

Local authorities will be expected to continue to use local housing need, assessed through the standard method, to inform the preparation of their plans; although the ability to use an alternative approach where there are exceptional circumstances that can be justified will be retained. We will, though, make clearer in the Framework that the outcome of the standard method is an advisory starting-point to inform plan-making – a guide that is not mandatory – and also propose to give more explicit indications in planning guidance of the types of local characteristics which may justify the use of an alternative method, such as islands with a high percentage of elderly residents, or university towns with an above-average proportion of students.

Housing and Social Care Legislation

- 1.29 Wider legislation affecting housing need includes the 1996 Housing Act (as amended), the Housing and Social Care Act 2012, the 2014 Care Act and 2017 Homelessness Reduction Act.
- 1.30 The 2014 Care Act sets out local authorities' duties in relation to assessing people's needs and their eligibility for publicly funded care and support. Under the Act, local authorities must carry out an assessment of anyone who appears to require care and support and focus the assessment on the person's needs and how they impact on their wellbeing, and the outcomes they want to achieve. Local authorities must also consider other things besides care services that can contribute to the desired outcomes (e.g. preventive services, community support and specialised housing needs).
- 1.31 The Homelessness Reduction Act 2017 places new legal duties on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help. Local Authorities have a duty to produce homelessness strategies to prevent homelessness in their respective areas.

Chelmsford Local Plan 2013 to 2036 adopted 2020

- 1.32 The plan identifies Chelmsford as part of a wider North and Central Essex Housing Market area. Relevant agreed key objectives of the HMA authorities are to provide new and improved infrastructure and ensure it is provided alongside development. A second relevant objective is to provide sufficient new homes to meet the needs of a growing and ageing population and provide a better balance between the location of jobs and housing.

1.33 The first two strategic priorities of the Chelmsford local plan are a) Ensuring sustainable patterns of development; and b) Meeting the need for new homes. The plan includes a number of Strategic and Development Management Policies which are relevant to this report:

- S1 – Spatial Principles includes an encouragement to optimise the use of previously developed land and to protect the Green Belt;
- S6 sets out the housing and employment requirements. For housing this means provision of 18,515 net new dwellings in the 2013-36 period at an average of 805 per annum.
- S7 – the Spatial Strategy provides for sustainable urban extensions and development around key service settlements in accordance with a settlement hierarchy. S7 goes on to state that there will be opportunities for small scale rural exception sites and windfall sites.
- S11 contains measures for protecting the green belt and Chelmsford's "Green Wedge".

- Policy DM1 states the council's policy regarding dwelling mix, accessible or adaptable dwellings, wheelchair user dwellings and self and custom build homes. This includes seeking 50% of homes to meet M4(2) accessible or adaptable dwelling standards and 5% of affordable housing to be built as M4(3) wheelchair user dwellings.
- DM2 states the Council's policy on affordable housing and Rural Exception sites. The headlines of the policy are a 35% affordable housing target on sites of 11 or more units and that the mix, size, type and cost should meet needs as established by housing needs assessments.

Local Plan Review 2022

1.34 The issues and options consultation has been completed and a feedback report has been prepared. According to the local development scheme (LDS) 8th review, the reviewed local plan will have a plan period covering 2022 to 2041. The LDS envisages adoption in quarter 1 or quarter 2 2025.

Neighbourhood planning

1.35 Neighbourhood development plans and other community plans can become part of the Local Plan with equal legal status. According to the Council's website 3 neighbourhood plans (Little Baddow, South Woodham Ferrers and Writtle have been adopted) – five plans are in different stages of formulation.

Housing Key Performance Indicators

1.36 In May 2023, the Council published Housing Key Performance Indicators (KPI) which provides a range of data about housing in the City Council area, much of which is relevant to analysis in this report. Key information from the KPI is summarised below, providing a good up-to-date baseline of data for this study – particularly regarding the need for affordable housing.

- 1.37 The KPI shows a substantial increase in the number of Housing Register applicants, increasing from 522 in March 2020/21 to 1,231 in May 2023 – a 136% increase. Within this, the number in the highest priority bands (Bands 1 and 2) has also increased, from 277 to 460 (a 66% increase). The number of households in Bands 1 and 2 has increased for all sizes of accommodation, but particularly larger homes – a 78% increase in those needing 3-bedroom accommodation and a 148% increase in those needing 4+-bedrooms. This points to a need for additional (and larger) affordable housing.
- 1.38 The number of household living in temporary accommodation (TA) has also increased substantially over time, from 243 in March 2020/21 up to 396 in May 2023 – a 63% increase. There has been a significant increase in those in TA requiring larger homes – the number needing 4+-bedrooms increasing from 22 to 56 over the period. The main increase in TA has been in nightly paid accommodation.

Qualitative research and stakeholder consultation

- 1.39 Whilst much of the project is based on analysis of a wide range of data sources covering a number of topics an initial stage of the project sought to speak to key players in the housing market to help provide some context for the analysis to follow. Below is a summary of these discussions and initial impressions of the City Council area.

Introduction

- 1.40 We visited the main settlements in City Council area to obtain context to the study and undertake face to face interviews with estate and letting agents. Detailed visits included Boreham, Chelmsford (and Chelmer Village), South Woodham Ferrers, and Writtle. We drove through many of the rural settlements along the A131, A414 and A1008. We undertook stakeholder consultation including selected registered providers and strategic housing officials employed by Essex County Council. We had a small but informative response to our questions for large businesses.

Overview of the City Council area

- 1.41 Whilst the Chelmsford built up area is large, the city administrative area as a whole is predominantly rural and agricultural. The largest settlements other than the Chelmsford built up area are Boreham, South Woodham Ferrers, and Writtle. These offer a wide range of services to local residents, surrounding villages and rural enterprises.
- 1.42 Writtle High Street is architecturally distinctive due to the age of its buildings, many of which are listed. There is a high proportion of local independent businesses. Writtle is also host to Writtle University College which specialises in land-based, animal, environmental, design and sport education. The Anglia Ruskin University (ARU) Chelmsford campus is a central, city-based campus that provides a wider range of subjects.

Consultation with Estate and Letting Agents

- 1.43 Interviews with agents covered the topics of gaps in supply, in-migration, investors. 5 agents were interviewed. Interviews took place at Writtle and Chelmsford.
- 1.44 At Writtle, agents reported high levels of transactions for sale or rent from households moving to the area, up to 60% of transactions. The combination of interest from those moving to the area, the rural character of the core village combined with a high proportion of listed buildings mean that prices are relatively high. They remain high also because of low levels of supply. Agents told us that when residents come to the area they tend to stay. Investors are active, relying on a reliable income stream from professionals and students rather than return on capital. There is strong demand for vacancies from university staff.
- 1.45 Agents told us that the high proportion of incomers to Chelmsford built up area, including its townships, were mostly from households moving out of London. We were told that relocation out of London allows wider choice of housing, lower living costs, better state education for their children and the ability to commute back to their place of work. The mainline station in Chelmsford itself is centrally situated.
- 1.46 Agents told us that due to the cost of living crisis, house shares and spare room lettings were becoming popular particularly if bills were included, however landlords were moving away from including energy costs.
- 1.47 Agents told us that market supply was reasonably balanced in respect of demand for most house types however there was an acute shortage of flats.
- 1.48 Agents told us that there is a shortage of flats for shared student accommodation. Residential landlords and letting agents are reluctant to let to student households because of the processing that is involved. Whilst there is a clear student residential area consisting of converted terraced housing close to the ARU Chelmsford campus, student lettings outside this area are sparse. We were told that a block of purpose-built student housing had recently been provided by a company specialising in this market.
- 1.49 We were told that supply of rented housing was not keeping up with demand because of an unwillingness to invest by a largely demoralised private rented sector. This was due to the cumulative effect of high purchase prices, changes to the tax system, increased regulation, and measures in the white paper “A Fairer Private Rented Sector” (2022). All agents reported high levels of demand citing long waiting lists. Most agents had only one or two vacancies at any time and were having to put a cap on the number of viewings for each vacancy. Agents told us that there was little evidence of build to rent initiatives and little scope for commercial to residential conversion on any significant scale.
- 1.50 In the urban area, agents commented that Chelmer Village has lower than average prices for relatively modern housing and was of interest to first time buyers both local and from incomers. We were told that a further driver of demand is the area’s proximity to well performing schools.

- 1.51 Agents told us demand from incomers to rural villages was largely older people seeking retirement destinations. These would be a mix of Chelmsford urban area residents and London households.

Consultation with Registered Providers

- 1.52 Questionnaires were sent to a selection of registered providers who were seeking to expand their stock holding. Two responses were received with the findings summarised below.
- 1.53 On the supply of social and affordable rented housing some difficulty was reported in letting 1-bedroom first floor sheltered flats and larger adapted dwellings. One registered provider reported that gaps in supply existed for larger 3 and 4-bedroom new build dwellings provided through S106 agreements.
- 1.54 Regarding regeneration, one respondent envisaged management intervention or regeneration that would involve decanting 70 to 100 tenants over the next 5-years and this would potentially put some pressure on the existing stock being needed to rehouse current tenants.
- 1.55 Both respondents were aware of the council's priorities for tenure and bedroom mix from large scale development of housing and the supply of affordable housing arising from it (through s106 agreements). One respondent considered that the main requirements are for 1-bedroom and larger 3- and 4-bedroom units.
- 1.56 The respondents were also asked about supported housing and both brought different insights to commissioning and service delivery although it was agreed that outsourcing of specialist care was necessary. One registered provider expressed an interest in working with learning disabilities and Gypsy Roma and Traveller groups. Registered providers agreed that there was little information available to them on the housing and care needs of specialist groups, relying on evidence and commissioning from the county council.
- 1.57 Regarding the need for affordable home ownership the respondents raised different issues which can be summarised as: a) changes in the help to buy agent system will necessitate closer working with the local authority regarding demand and strengthen the effectiveness of registered provider internal application processes; and b) shared ownership remains a highly popular product.
- 1.58 Homeoption (homeoption.org) is the Choice Based Lettings scheme which enables applicants to choose where they want to live by expressing an interest in (bidding on) suitable properties in areas of their choice. As well as Chelmsford, the scheme includes the six local authorities of Brentwood, Broxbourne, East Herts, Epping Forest and Uttlesford. When asked about the system both Registered Providers were favourable of the quality and efficiency of the service.

Consultation with Essex County Council strategic housing team

- 1.59 Telephone interviews took place with members of the strategic housing team. It is unusual that a non-unitary county council employs a team of housing specialists. It was explained to us that the role of the team was to ensure that strategic county functions that had implications for housing was well co-ordinated with local planning authorities (LPA) and local housing authorities (LHA). The critical issues identified by the team were:
- refresh of the Essex wide housing strategy;
 - infrastructure for new development (roads, transport, community services);
 - designing and delivering the garden villages;
 - delivery of social care in areas of housing growth;
 - health and social care; and
 - co-ordination of homelessness related services.
- 1.60 Regarding garden villages, officers were keen to learn from the older “New Towns” and more recent urban extensions.
- 1.61 Officers pointed out that social care was the largest area of spending of the council. The council was engaging with registered providers and there was a specific programme for extra care housing. The aim here was to influence LPA/LHA policy providers and seek to replicate the Hertfordshire commissioning strategy. Officers told us that addressing the needs of the aging population was a major challenge for the county. The strategic approach was to assist people to live independently with appropriate support and adaptation for as long as possible.
- 1.62 Officers told us about the impact of out of (London) borough placements of homeless and vulnerable people and the bi-lateral agreement that had been reached. Also, the partnership working with the nine Essex local authorities to address rough sleeping.
- 1.63 We expressed our concern over problems in achieving effective consultation with the NHS on housing issues across the country. Officers explained that the county was responsible for public health and working with that team provided the housing team with data and insights that helped to shape strategy and policy. There was a focus on delivering healthy outcomes through the design of garden communities through addressing car dependency, housing density and social isolation.

Consultation with large and medium sized businesses

- 1.64 A confidential consultation was undertaken in the form of a short survey to understand the extent to which Chelmsford’s housing offer (in terms of supply, house type, price and location) was a barrier to recruiting and retaining the employer’s labour force. The questionnaire was designed to enable respondents to answer the key question succinctly, with the option of providing more detailed information, including the extent to which the enterprise employed essential local workers.

- 1.65 Three responses were received. All three answered the first question. One considered that the housing offer was a major barrier to recruitment and retention. One considered it was a factor but not a major factor, the other considered it was no barrier at all. The third response did not answer our detailed questions. One detailed response was from a major employer with a workforce of over 500 employees. The second full response was from a medium sized employer with between 50 and 100 employees.
- 1.66 The major employer told us that employees were mostly full time permanent employees with few fixed term employees and sub-contractors. There were none on zero hours contracts. Around 4% of employees were apprentices. It did not employ any essential local workers. The company experiences 15% turnover in staff per annum and this was increasing annually. The company would not provide assistance with housing other than relocation allowance for key roles. The company expected the size of the workforce not to change over the next few years. The company told us that apprentices and production operators or staff on were proving difficult to recruit from national living wage were difficult to recruit from outside the area. The company considered that this affected the diversity of the company's workforce. Staff particularly faced difficulty in finding good quality private rented sector housing. The company thought that access to lodgings, house share and flats for singles and couples could assist.
- 1.67 The medium sized company mostly employed full time permanent staff with small proportions of part time and zero hours workers. It does not employ any essential local workers. It does not provide any accommodation for staff. The company expects its workforce to grow by around 10% over the next 5-years and considers that local housing supply is a major barrier to recruitment and retention of all grades of staff. Again, it was highlighted that staff faced difficulty in finding good quality private rented housing and that access to lodgings, house share and flats for singles and couples could assist.

Further Observations on Employment and the Housing Market

- 1.68 The announcement of the employment strategy for the NHS (July 2023) will have implications for Chelmsford. The planned and funded first 5-years of the strategy will increase the number of medical students and employees particularly in hospitals. In particular, the number of apprentices will increase. These measures are likely to put further pressure on the private rented sector. Falling private rented sector capacity is a key finding of this qualitative research and action is needed if the NHS strategy is not to be impacted.

Structure of this Report

1.69 This report sets out a number of either linked or distinct sections; these are summarised below with a brief description:

- Section 2 – Area Profile – Provides background analysis including looking at demographic trends, house prices and house price changes;
- Section 3 – Overall Housing Need – Uses the Standard Method to calculate housing need and also considers circumstances where an alternative housing requirement might be justified;
- Section 4 – Affordable Housing Need – Updates previous analysis about the need for affordable housing and builds on this by considering changes in the NPPF since the previous assessment and more recent Government announcements;
- Section 5 – Housing Mix – This section assesses the need for different sizes of homes in the future, modelling the implications of demographic drivers on need/demand for different sizes of homes in different tenures.
- Section 6 – The Needs of Older People and People with Disabilities – Considers the need for specialist accommodation for older people (e.g. sheltered/Extra-care) and also the need for homes to be built to Building Regulations M4(2) any M4(3). The section studies a range of data around older persons and people with disabilities;
- Section 7 – Private Rented Sector – studies a range of statistics about household living in private rented accommodation and considers the potential for Build-to-Rent homes in the City Council area; and
- Section 8 – Other Groups – Provides information about the demand for and supply of custom- and self-build housing plots and reviews the requirement for accommodation for children in need of social services care following a Ministerial Statement in May 2023.

Rounding

1.70 It should be noted that the numbers included in tables and figures throughout the report may not sum exactly due to rounding.

Background: Key Messages

- This report provides a new Strategic Housing Needs Assessment (SHNA) for Chelmsford City Council. This report focusses on overall housing need, including consideration of the Standard Method as well as looking at affordable housing in the context of changing Government policy (including in relation to First Homes) and the needs of specific groups such as older people.
- The study follows the approach set out in the latest published National Planning Policy Framework (NPPF) and supporting Planning Practice Guidance (PPG) and uses the latest available demographic data from the Office for National Statistics (ONS) and a range of other available datasets to provide a contextual picture and analysis of the housing market for the Council's administrative area.
- To understand the area, an initial phase of work was carried out to talk with key players in the housing market (including estate and letting agents). From this, agents noted the private rented sector in Chelmsford, like most other parts of the country, cannot deliver the supply needed and that this is particularly acute in Chelmsford due to the scale of out-migration from London. Additionally, both registered providers and the County Council highlighted delivery of extra-care housing for older people as a particular issue and this is picked up later in this report.
- Overall, the report sets out a number of either linked or distinct sections to cover a range of core subject areas; the sections are summarised below:
 - Section 2 – Area Profile;
 - Section 3 – Overall Housing Need;
 - Section 4 – Affordable Housing Need;
 - Section 5 – Housing Mix;
 - Section 6 – The Needs of Older People and People with Disabilities;
 - Section 7 – Private Rented Sector; and
 - Section 8 – Other Groups.

2. Area Profile

Introduction

2.1 This section provides some background analysis about population and housing in Chelmsford, with data also provided for each of three sub-areas. Data is compared with local, regional and national data as appropriate. The analysis can be summarised as covering three main topic headings:

- Demographic baseline (including data on population age structure and changes)
- Housing stock (including type and tenure)
- Housing market (including data on house prices)

2.2 The sub-areas used in analysis have been based on groups of wards. The table below shows the sub-areas names and the wards included within each area.

Area name	Wards
Urban	Chelmer Village and Beaulieu Park, Goat Hall, Great Baddow East, Great Baddow West, Marconi, Moulsham and Central, Moulsham Lodge, Patching Hall, St Andrews, Springfield North, The Lawns, Trinity, Waterhouse Farm
Rural	Bicknacre and East and West Hanningfield, Boreham and The Leighs, Broomfield and The Walthams, Chelmsford Rural West, Galleywood, Little Baddow, Danbury and Sandon, Rettendon and Runwell, South Hanningfield, Stock and Margaretting, Writtle
South Woodham Ferrers	South Woodham-Chetwood and Collingwood, South Woodham-Elmwood and Woodville

Population

2.3 As of mid-2021, the population of Chelmsford is estimated to be 181,800 this is a growth of around 13,300 people over the previous decade. This equates to a growth of around 8% since 2011 which is a similar rate of growth to that across Essex and the East of England region, and slightly higher than seen nationally (6.5%).

	Population (2011)	Population (2021)	Change	% change
Chelmsford	168,491	181,763	13,272	7.9%
Essex	1,396,599	1,506,345	109,746	7.9%
East of England	5,862,418	6,348,096	485,678	8.3%
England	53,107,169	56,536,419	3,429,250	6.5%

Source: Mid-year population estimates

- 2.4 The table below considers population growth rate in the 20-year period from 2001 to 2021. The analysis shows over this longer period that the population of Chelmsford has grown at a broadly similar rate to that seen in other areas.

Figure 2.3: Population Annual Growth Rate (2001-2021)			
	Growth Rate (2001 – 2011)	Growth Rate (2011 – 2021)	Growth Rate (2001 – 2021)
Chelmsford	0.7%	0.8%	0.8%
Essex	0.6%	0.8%	0.7%
East of England	0.9%	0.8%	0.9%
England	0.7%	0.6%	0.7%

Source: Mid-year population estimates

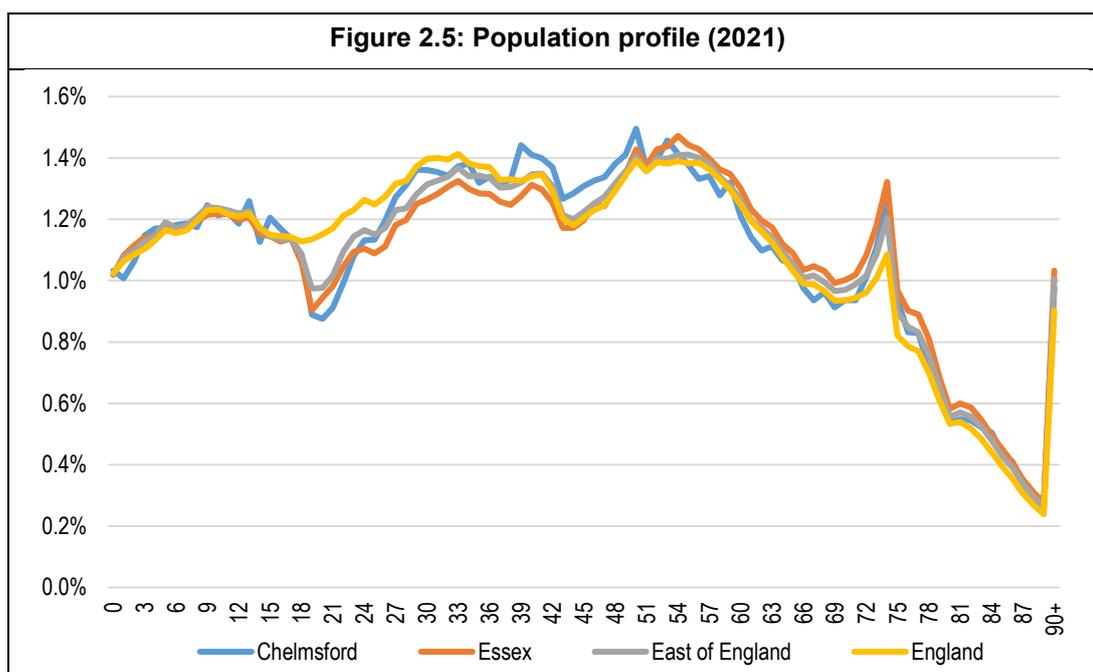
- 2.5 The table below shows the current (2021) population in each of the sub-areas – this is based on the 2021 Census and so totals differ very slightly from those above (which are mid-year estimates). The analysis shows around three-fifths of the population as living in the Urban area with the next largest area being Rural, with 32% of the population.

Figure 2.4: Population by sub-area (2021)		
	Population	% of population
Urban	107,205	59.1%
Rural	58,269	32.1%
South Woodham Ferrers	16,021	8.8%
TOTAL	181,495	100.0%

Source: Census (2021)

Age Structure

- 2.6 The figure below shows the age structure by single year of age (compared with a range of other areas). From this it is clear that Chelmsford has a similar age structure to than seen across the County and region, with the main difference to the national position being a lower proportion of people in their late teens and early 20s – this will be related to students with many people leaving the City to study compared with the number of students moving in the opposite direction. The age structure regarding older persons is broadly similar to that seen in other locations.



Source: Mid-year population estimates

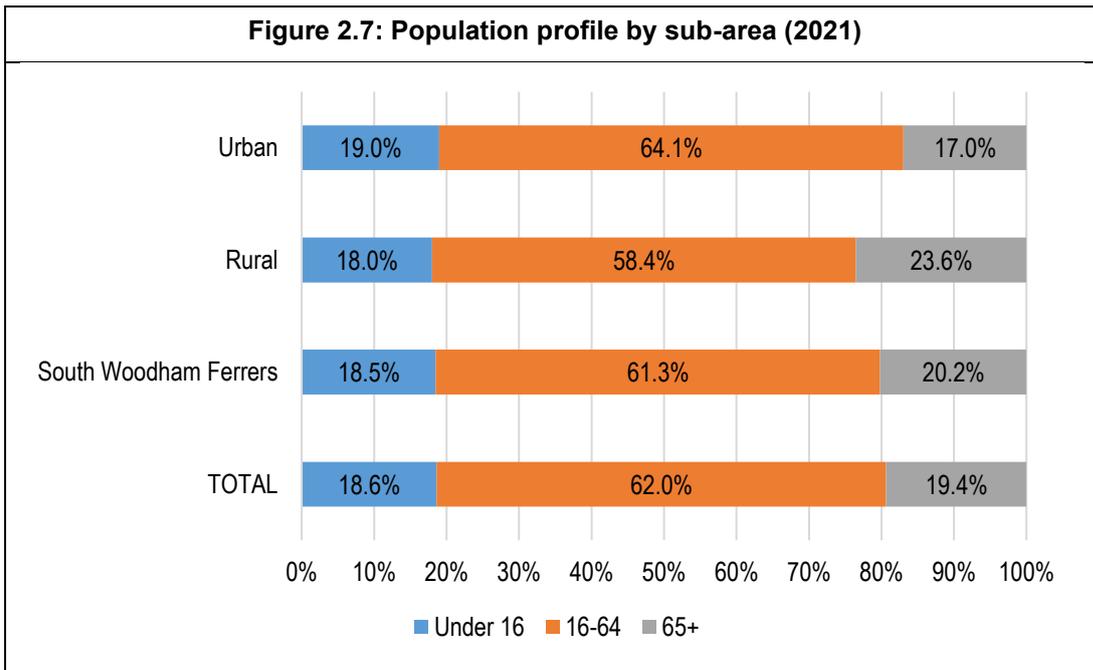
- 2.7 The analysis below summarises the above information (including total population numbers for Chelmsford) by assigning population to three broad age groups (which can generally be described as a) children, b) working age and c) pensionable age). This analysis points to a similar broad age structure in the City compared with other locations.

Figure 2.6: Population profile (2021) – summary age bands

	Chelmsford		Essex	East of England	England
	Population	% of population	% of population	% of population	% of population
Under 16	33,797	18.6%	18.6%	18.7%	18.5%
16-64	112,690	62.0%	60.7%	61.6%	63.0%
65+	35,276	19.4%	20.7%	19.7%	18.5%
All Ages	181,763	100.0%	100.0%	100.0%	100.0%

Source: Mid-year population estimates

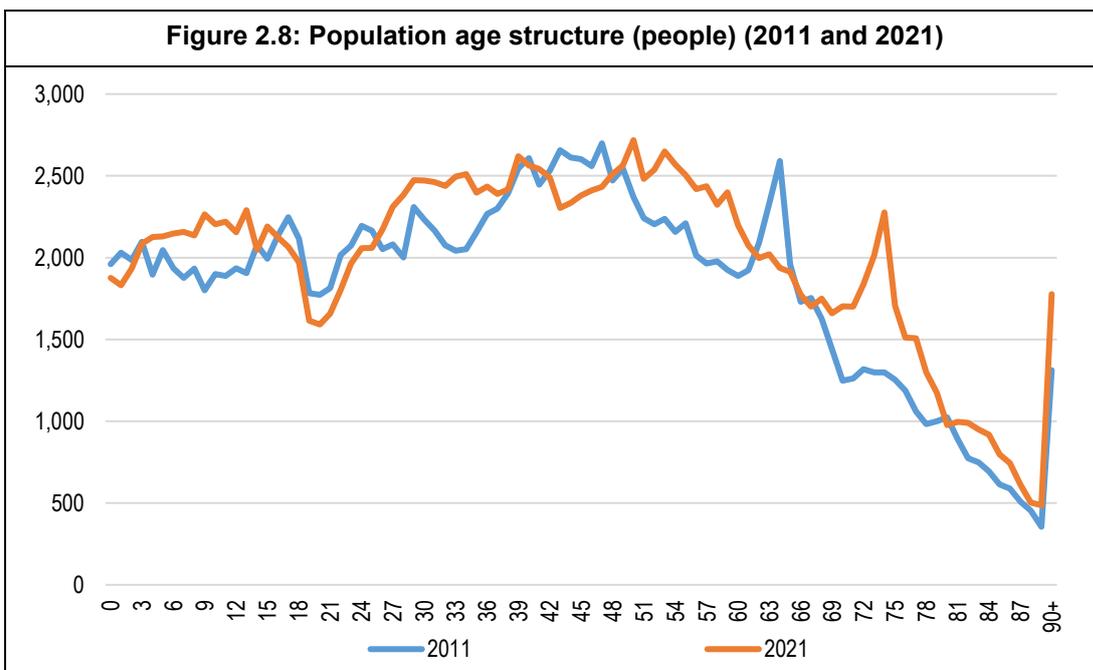
- 2.8 The figure below shows the population profile by sub-area (from the 2021 Census). This shows some notable differences between locations – particularly with regard to the proportion of the population aged 65 and over – this ranges from 17% in the Urban area up to 24% in Rural locations.



Source: Census (2021)

Age Structure Changes

2.9 The figure below shows how the age structure of the population has changed in the 10-year period from 2011 to 2021 – the data used is based on population so will also reflect the increase seen in this period. There have been some changes in the age structure, including increases in the population in their 50s; the number of people aged 65 and over also looks to have increased notably. Where there are differences, it is often due to cohort effects (i.e. smaller or larger cohorts of the population getting older over time).



Source: Mid-year population estimates (2021)

- 2.10 The information above is summarised into three broad age bands to ease comparison. The table below shows an increase of 4% in the 16–64 age group and a much larger increase of 24% in the 65+ age group. The population aged 65 and over accounts for 52% of all population change over this period.

	2011	2021	Change	% change
Under 16	31,257	33,797	2,540	8.1%
16-64	108,856	112,690	3,834	3.5%
65+	28,378	35,276	6,898	24.3%
TOTAL	168,491	181,763	13,272	7.9%

Source: Mid-year population estimates

Components of Population Change

- 2.11 The table below consider the drivers of population change 2001 to 2021 – this is data published prior to any corrections due to the 2021 Census and shows ONS monitoring of population estimates. The main components of change are natural change (births minus deaths) and net migration (internal/domestic and international).
- 2.12 There is also an Unattributable Population Change (UPC) which is a correction made by ONS upon publication of Census data if population has been under- or over-estimated (this is only calculated for the 2001-11 period). There are also ‘other changes’, which for Chelmsford are relatively low (and in both a positive and negative direction depending on the year) – these changes are often related to armed forces personnel or boarding school pupils.
- 2.13 The data shows natural change (births minus deaths) to generally be dropping over time and migration is variable, with no clear trend – it is however clear that migration, and particularly internal (domestic) migration is the main driver of population change in the City.
- 2.14 The analysis also shows (for the 2001-11 period) a modest positive level of UPC, this suggests when the 2011 Census was published ONS had previously under-estimated population change (albeit the figures are not significant).
- 2.15 Overall the data shows a continuing trend of strong population growth throughout the period studied and it is notable that population is estimated to have grown by in excess of 700 people every year back to 2008/9.

Figure 2.10: Components of population change, mid-2001 to mid-2021 – Chelmsford

	Natural change	Net internal migration	Net international migration	Other changes	Other (unattributable)	Total change
2001/2	346	1,064	-121	12	116	1,417
2002/3	507	902	151	8	106	1,674
2003/4	534	1,574	-41	-34	112	2,145
2004/5	473	220	250	27	95	1,065
2005/6	738	-280	-235	-6	92	309
2006/7	559	-2	-189	34	100	502
2007/8	757	-338	164	-17	100	666
2008/9	682	447	-69	25	76	1,161
2009/10	695	164	289	-52	137	1,233
2010/11	626	224	107	-21	114	1,050
2011/12	664	-76	307	-7	0	888
2012/13	502	289	206	-65	0	932
2013/14	657	114	376	132	0	1,279
2014/15	460	37	636	-4	0	1,129
2015/16	507	463	402	106	0	1,478
2016/17	512	1,244	242	-1	0	1,997
2017/18	440	344	223	-122	0	885
2018/19	321	668	293	27	0	1,309
2019/20	69	759	391	-58	0	1,161
2020/21	265	299	182	-5	0	741

Source: ONS

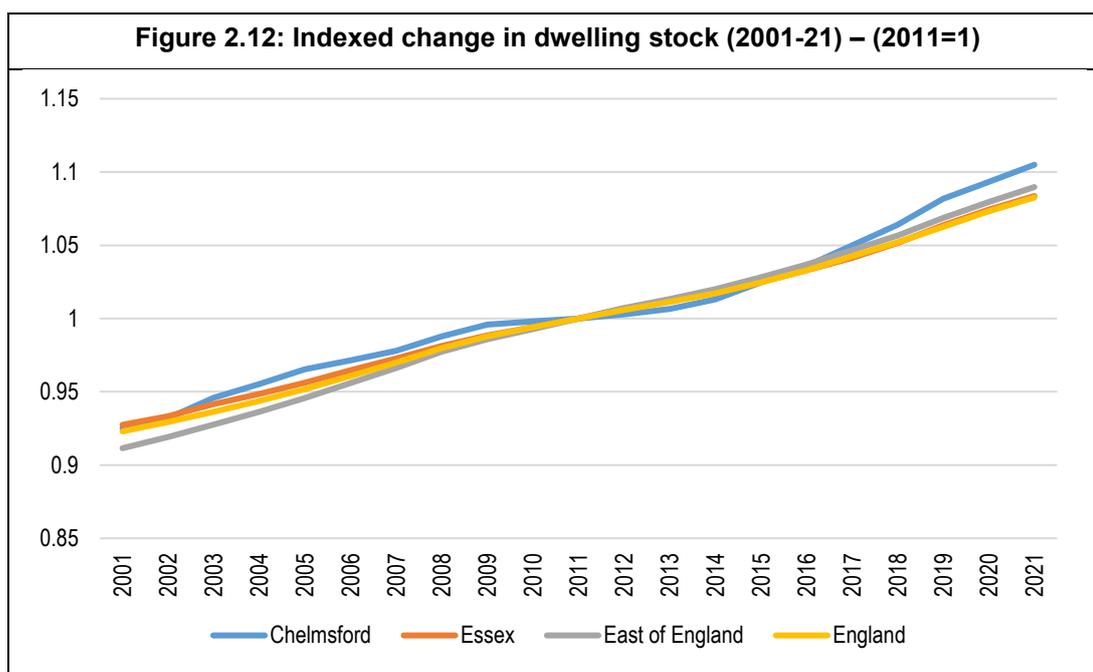
Housing Stock

2.16 As of 2021 there were 78,700 dwellings in Chelmsford, an increase of 7,500 over the 10-year period from 2011 – this represents a 10% increase in the number of homes, higher than seen across a range of benchmark areas. The figure below the table shows dwelling completions to have broadly followed trends in other areas at least as far back to 2001 – with a slight upturn over the past 4-5 years.

Figure 2.11: Change in dwellings (2011-21)

	Dwellings (2011)	Dwellings (2021)	Change	% change
Chelmsford	71,247	78,724	7,477	10.5%
Essex	603,842	654,333	50,491	8.4%
East of England	2,531,907	2,759,088	227,181	9.0%
England	22,976,066	24,873,321	1,897,255	8.3%

Source: DLUHC (Live Table 125)



Source: DLUHC (Live Table 125)

- 2.17 By using Census data about the number of households it is possible to estimate the number of vacant homes in the City and how this has changed from 2011 to 2021. In 2011, there were 69,667 households in the City, implying a vacancy rate of 2.2%; by 2021 there were 75,400 households and an implied vacancy rate of 4.2%. This suggests the proportion of vacant homes has increased, which is also the general trend seen across other areas, the proportion of vacant homes nationally is estimated to have increased from 4.0% to 5.8% over the 2011-21 decade.

Figure 2.13: Estimated proportion of vacant homes (2011 and 2021)

	2011	2021
Chelmsford	2.2%	4.2%
Essex	3.7%	4.3%
East of England	4.3%	4.7%
England	4.0%	5.8%

Source: DLUHC (Live Table 125) and Census

- 2.18 The table below shows estimates of vacant homes by sub-area from the Census – as the Census shows a slightly different dwelling count to the tables above the overall vacancy rate from this analysis is shown to be 4.0% - this figure varies from 2.2% of homes being vacant in South Woodham Ferrers, up to 4.2% in both the Urban and Rural sub-areas.

	Households	Dwellings	% vacant
Urban	45,055	47,025	4.2%
Rural	23,748	24,794	4.2%
South Woodham Ferrers	6,597	6,743	2.2%
TOTAL	75,400	78,562	4.0%

Source: Census (2021)

Tenure

2.19 The table below shows household tenure compared with a number of other locations. The analysis identifies a relatively high proportion of owner-occupiers, particularly those with a mortgage. The proportion of households living in both the social rented sector and private rented accommodation is lower than observed in other areas. The figures for private rent include a small number of households categorised as living rent free.

	Chelmsford		Essex	East of England	England
	Households	% of households	% of households	% of households	% of households
Owns outright	27,058	35.9%	36.3%	34.6%	32.5%
Owns with mortgage/loan	26,572	35.2%	33.5%	31.6%	29.8%
Social rented	10,017	13.3%	14.1%	15.5%	17.1%
Private rented	11,757	15.6%	16.0%	18.3%	20.6%
TOTAL	75,404	100.0%	100.0%	100.0%	100.0%

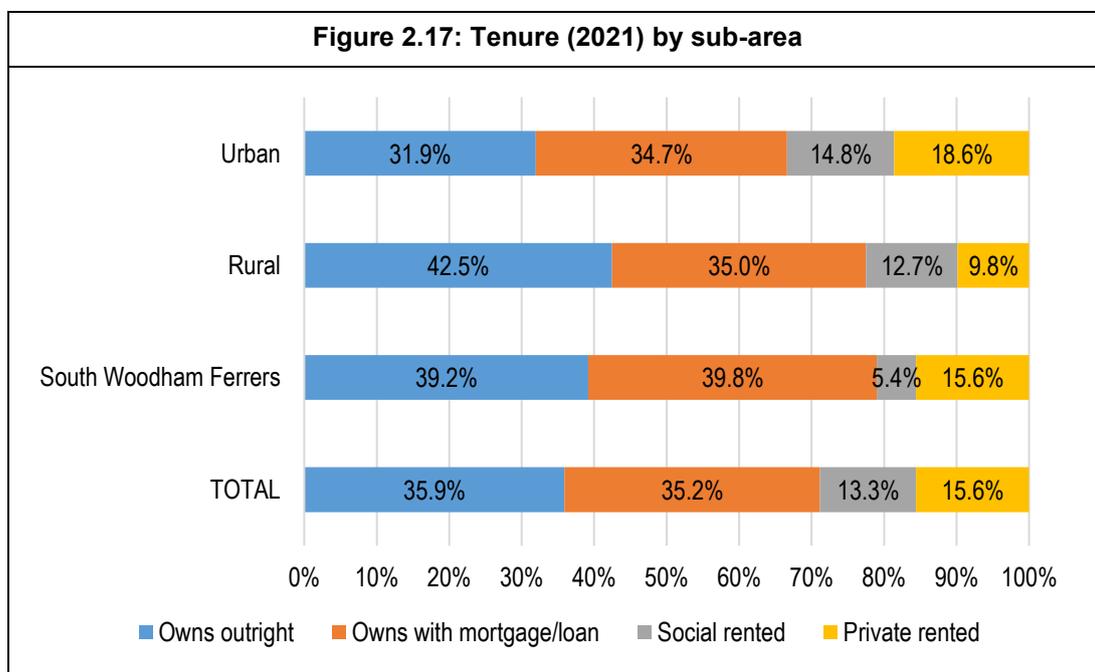
Source: 2021 Census

2.20 As well as looking at the current tenure profile, it is of interest to consider how this has changed over time; the table below shows data from the 2011 and 2021 Census. From this it is clear that there has been notable growth in the number of households who are outright owners and a modest decline in owners with a mortgage. Both the social and private rented sectors have seen increases over time (with the private rented sector increasing by 29% in the decade).

	2011	2021	Change	% change
Owns outright	23,696	27,058	3,362	14.2%
Owns with mortgage/loan	27,732	26,572	-1,160	-4.2%
Social rented	9,120	10,017	897	9.8%
Private rented	9,119	11,757	2,638	28.9%
TOTAL	69,667	75,404	5,737	8.2%

Source: Census (2011 and 2021)

2.21 The figure below shows the tenure split by sub-area – this shows owner-occupation to be the main tenure in all areas. The proportion of households living in social rented housing is fairly low in all locations and in particular South Woodham Ferrers at just 5.4% of stock. There are wide variations in the proportion of households living in the private rented sector, ranging from 10% in Rural areas, up to 19% in Urban locations.



Source: Census (2021)

Dwelling Type

2.22 The 2021 Census shows that, semi-detached homes were the most common dwelling type within Chelmsford at 31% of total dwelling stock, although overall the stock has a broadly similar proportion of different types of home – with proportions also broadly similar to that seen in other locations.

Figure 2.18: Accommodation type (2021)

	Chelmsford		Essex	East of England	England
	Dwellings	% of dwellings	% of dwellings	% of dwellings	% of dwellings
Detached	22,310	29.6%	30.5%	29.6%	22.9%
Semi-detached	23,467	31.1%	31.5%	31.0%	31.5%
Terraced	14,117	18.7%	19.9%	21.2%	23.0%
Flat/other	15,510	20.6%	18.1%	18.2%	22.6%
TOTAL	75,404	100.0%	100.0%	100.0%	100.0%

Source: Census (2021)

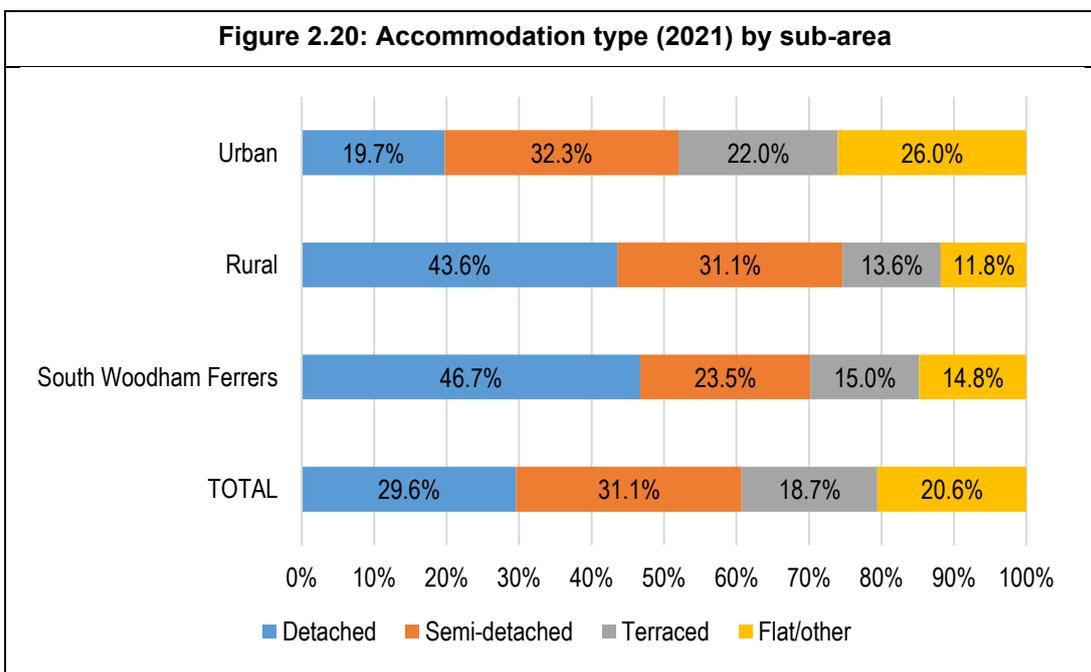
2.23 The Census can also be used to look at changes in dwelling types over the 2011-21 decade. This shows a notable increase in the number of flats in the City, increasing by 25% over the decade and accounting for over half of all dwelling change. Around a quarter of all dwelling change is accounted for by each of detached and semi-detached homes, with the data suggesting a modest decline in the number of terraced homes.

Figure 2.19: Change in accommodation type (2011-21) – Chelmsford

	2011	2021	Change	% change	% of change
Detached	20,909	22,310	1,401	6.7%	24.4%
Semi-detached	22,008	23,467	1,459	6.6%	25.4%
Terraced	14,319	14,117	-202	-1.4%	-3.5%
Flat/other	12,431	15,510	3,079	24.8%	53.7%
TOTAL	69,667	75,404	5,737	8.2%	100.0%

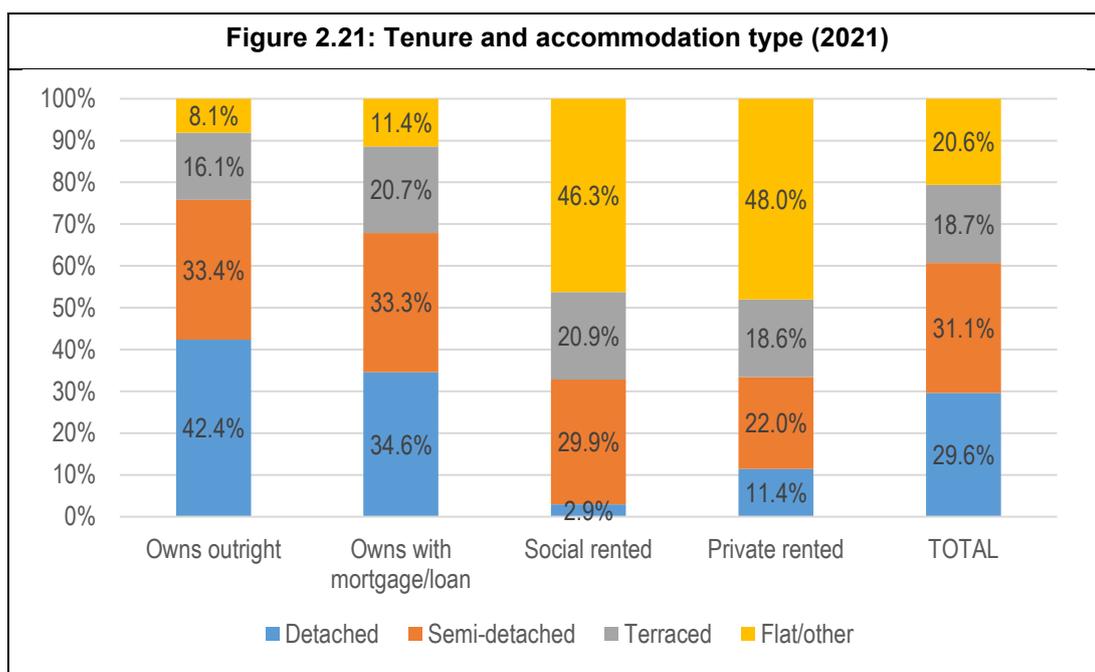
Source: Census (2011 and 2021)

2.24 The figure below shows accommodation type and sub-area – this shows the main type of housing varies by location with detached homes being the main stock in Rural areas and South Woodham Ferrers, in Urban areas detached has the lowest proportions. The proportion in the flat/other group ranges from 12% of homes in Rural areas (including 2% of homes in this area classified as ‘caravan or other mobile or temporary structure’) up to 26% in Urban locations.



Source: Census (2021)

2.25 The figure below shows a cross-tabulation of tenure and accommodation type. This clearly shows the majority of owners (notably outright owners) as living in detached or semi-detached homes, whereas the social and private rented sectors are heavily concentrated on flats – only 8% of outright owners live in a flat compared with 48% in the private rented sector and 46% for social rented housing.



Bedrooms (accommodation size)

2.26 The analysis below shows the number of bedrooms available to households as of the 2021 Census. Generally, the size profile in Chelmsford is one of slightly larger homes with 29% of homes having 4+-bedrooms – this compares with just 21% nationally. The proportion of 2-bedroom homes is relatively low compared with other locations. Overall, the average number of bedrooms in a home is 2.83, higher than both the regional (2.77) and national (2.71) average. The actual average number of bedrooms will actually be higher than these figures as the Census data has a cut-off at 4+-bedrooms (and for the purposes of calculating an average 4+-bedroom homes are treated as having 4-bedrooms).

Figure 2.22: Number of bedrooms (2021)

	Chelmsford		Essex	East of England	England
	House-holds	% of house-holds	% of house-holds	% of house-holds	% of house-holds
1-bedroom	8,712	11.6%	10.6%	10.7%	11.6%
2-bedrooms	16,866	22.4%	26.3%	25.8%	27.3%
3-bedrooms	28,151	37.3%	37.8%	39.6%	40.0%
4+-bedrooms	21,671	28.7%	25.2%	23.9%	21.1%
TOTAL	75,400	100.0%	100.0%	100.0%	100.0%
Average bedrooms	2.83		2.77	2.77	2.71

Source: Census (2021)

- 2.27 The table below shows how the number of bedrooms has changed over the 2011-21 decade for the whole of the City. This shows that in excess of 50% of the change is accounted for by 4+-bedroom homes, with increases also seen for 1- and 2-bedroom homes. The analysis points to homes with 3-bedrooms having declined slightly over the decade, although 3-bedroom homes are still the main size in the stock.

	2011	2021	Change	% change	% of change
1-bedroom	7,504	8,712	1,208	16.1%	21.1%
2-bedrooms	15,429	16,866	1,437	9.3%	25.1%
3-bedrooms	28,303	28,151	-152	-0.5%	-2.7%
4+-bedrooms	18,431	21,671	3,240	17.6%	56.5%
TOTAL	69,667	75,400	5,733	8.2%	100.0%

Source: Census (2011 and 2021)

Overcrowding and Under-Occupation

- 2.28 The analysis below studies levels of overcrowding and under-occupation – this is based on the bedroom standard with data taken from the 2021 Census. The box below shows how the standard is calculated, this is then compared with the number of bedrooms available to the household (with a negative number representing overcrowding and a positive number being under-occupation). Households with an occupancy rating of +2 or more have at least two spare bedrooms.

For the purposes of the bedroom standard a separate bedroom shall be allocated to the following persons –

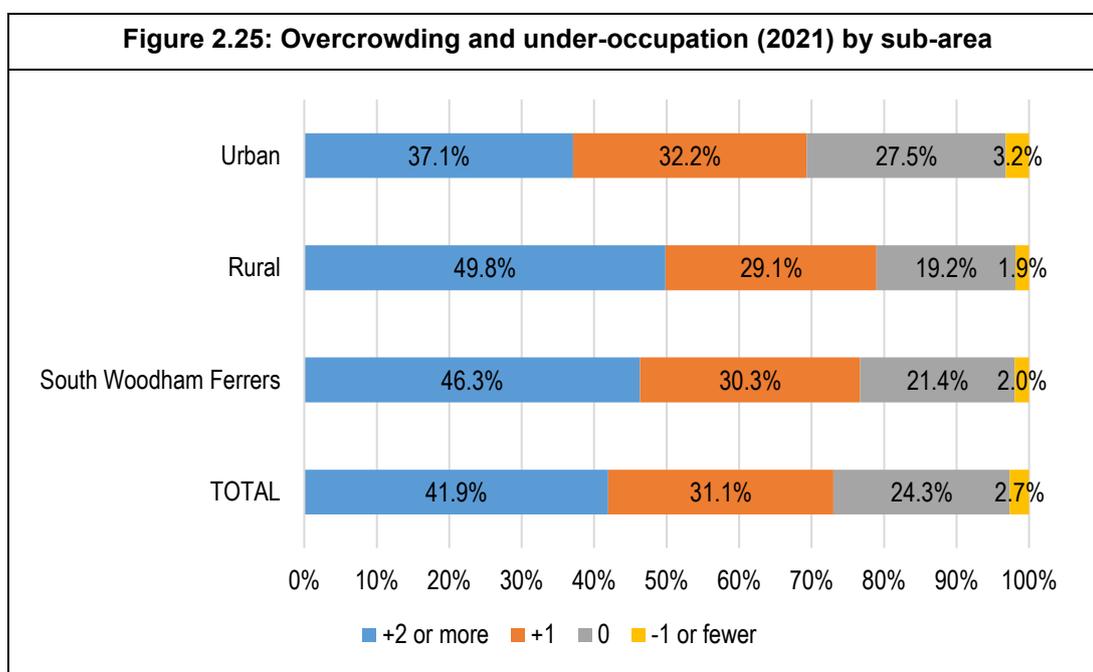
- (a) A person living together with another as husband and wife (whether that other person is of the same sex or the opposite sex)
- (b) A person aged 21 years or more
- (c) Two persons of the same sex aged 10 years to 20 years
- (d) Two persons (whether of the same sex or not) aged less than 10 years
- (e) Two persons of the same sex where one person is aged between 10 years and 20 years and the other is aged less than 10 years
- (f) Any person aged under 21 years in any case where he or she cannot be paired with another occupier of the dwelling so as to fall within (c), (d) or (e) above.

- 2.29 The analysis shows that levels of overcrowding in Chelmsford are low in a national context with only 2.7% of households being overcrowded in 2021 (compared with 4.4% nationally). This level of overcrowding is also below the regional average. Levels of under-occupation are also relatively high with around 42% of households having a rating of +2 or more – this is higher than seen in other areas.

	Chelmsford		Essex	East of England	England
	Number of households	% of households	% of households	% of households	% of households
+2 or more	31,600	41.9%	38.3%	38.5%	35.6%
+1	23,446	31.1%	33.5%	32.9%	33.2%
0	18,347	24.3%	25.0%	25.2%	26.8%
-1 or fewer	2,011	2.7%	3.2%	3.4%	4.4%
TOTAL	75,404	100.0%	100.0%	100.0%	100.0%

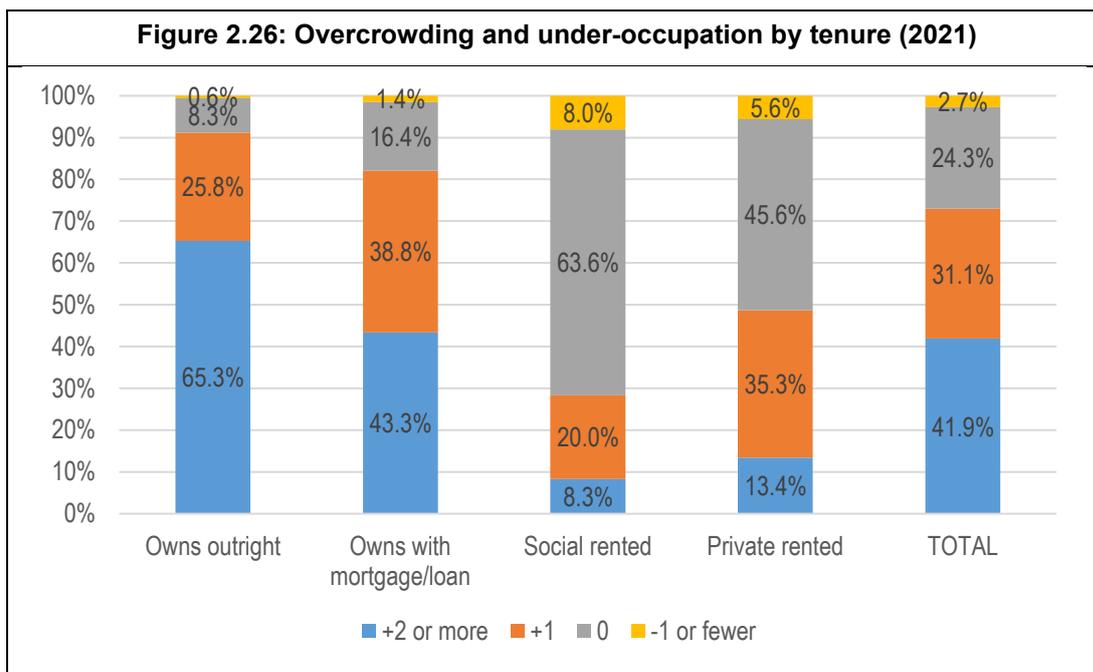
Source: Census (2021)

- 2.30 The figure below shows overcrowding and under-occupation by sub-area. This shows low levels of overcrowding across the City and that all locations have levels of overcrowding below the regional and national average.



Source: Census (2021)

- 2.31 The figure below shows overcrowding and under-occupation by tenure. This shows low levels of overcrowding in the owner-occupied sector, particularly outright owners with the highest level being seen in social rented housing (8% of all households are overcrowded). Levels of under-occupation are also high in the owner-occupied sector and much lower for social rented homes.



Source: Census (2021)

2.32 The table below shows how levels of overcrowding and under-occupancy have changed in the 2011-21 decade. This shows a significant increase in the number of household under-occupying homes and a more modest increase in overcrowding.

Figure 2.27: Change in overcrowding and under-occupation (2011-21) – Chelmsford

	2011	2021	Change	% change
+2 or more	29,018	31,600	2,582	8.9%
+ 1	22,674	23,446	772	3.4%
0	16,110	18,347	2,237	13.9%
-1 or fewer	1,865	2,011	146	7.8%
TOTAL	69,667	75,404	5,737	8.2%

Source: Census (2011 and 2021)

2.33 Focussing on overcrowding, the table below shows changes in the 2011-21 decade by tenure. This shows a significant increase in the number of overcrowded households in the social rented stock (a 23% increase over the 10-year period) along with a 15% increase in the private rented sector. The number of overcrowded owner-occupiers fell by 14% over the period studied.

Figure 2.28: Change in overcrowding by tenure (2011-21) – Chelmsford

	2011	2021	Change	% change
Owner-occupied	636	546	-90	-14.2%
Social rented	655	804	149	22.7%
Private rented	574	661	87	15.2%
TOTAL	1,865	2,011	146	7.8%

Source: Census (2011 and 2021)

House Prices

- 2.34 In the year to September 2022 the median house price in Chelmsford was £385,000 – this is above the average seen in the benchmark areas, including being some 40% above the national average.

	Price	Difference from England
Chelmsford	£385,000	+40%
Essex	£352,000	+28%
East of England	£328,000	+19%
England	£275,000	-

Source: ONS Small Area House Price Statistics

- 2.35 At a sub area level, Rural locations see the highest median prices at £455,500 with the lowest in South Woodham Ferrers at £360,000 – which is similar to Urban locations at £365,000. All areas have an average price above the County, regional and national average.

	Median price
Urban	£365,000
Rural	£455,500
South Woodham Ferrers	£360,000
ALL	£385,000

Source: Land Registry Price Paid data

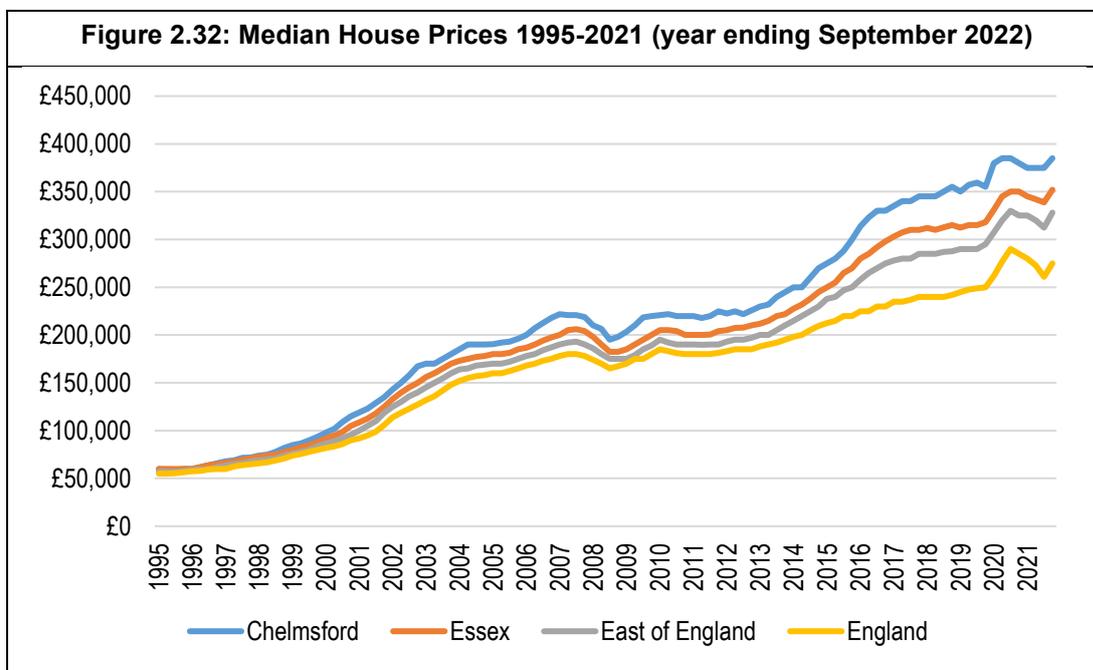
- 2.36 The table below shows median prices by dwelling type. This again shows some significant differences between prices in Chelmsford and other locations – it is however the case that a median flat price in the City Council area is slightly lower than the national average (which is likely to be influenced by prices of flats in London). The higher prices in Chelmsford do point to relatively strong housing demand.

	Flat/ Maisonette	Terraced	Semi- Detached	Detached	All Sales
Chelmsford	£219,000	£350,000	£415,000	£600,000	£385,000
Essex	£200,000	£317,000	£369,500	£515,000	£352,000
<i>Differential</i>	<i>£19,000</i>	<i>£33,000</i>	<i>£45,500</i>	<i>£85,000</i>	<i>£33,000</i>
East of England	£200,000	£294,625	£335,150	£465,000	£328,000
<i>Differential</i>	<i>£19,000</i>	<i>£55,375</i>	<i>£79,850</i>	<i>£135,000</i>	<i>£57,000</i>
England	£220,000	£225,000	£260,000	£425,000	£275,000
<i>Differential</i>	<i>-£1,000</i>	<i>£125,000</i>	<i>£155,000</i>	<i>£175,000</i>	<i>£110,000</i>

Source: ONS Small Area House Price Statistics

House Price Changes

2.37 The figure below shows growth in the median house price over the period since 1995. House prices in Chelmsford closely followed the national trend across England over time, with stronger price growth in the pre-recessionary period between 2003 and 2008, a dip during the recession and a strong increase to 2018 before seeing some variation over the last couple of years or so.



Source: ONS Small Area House Price Statistics

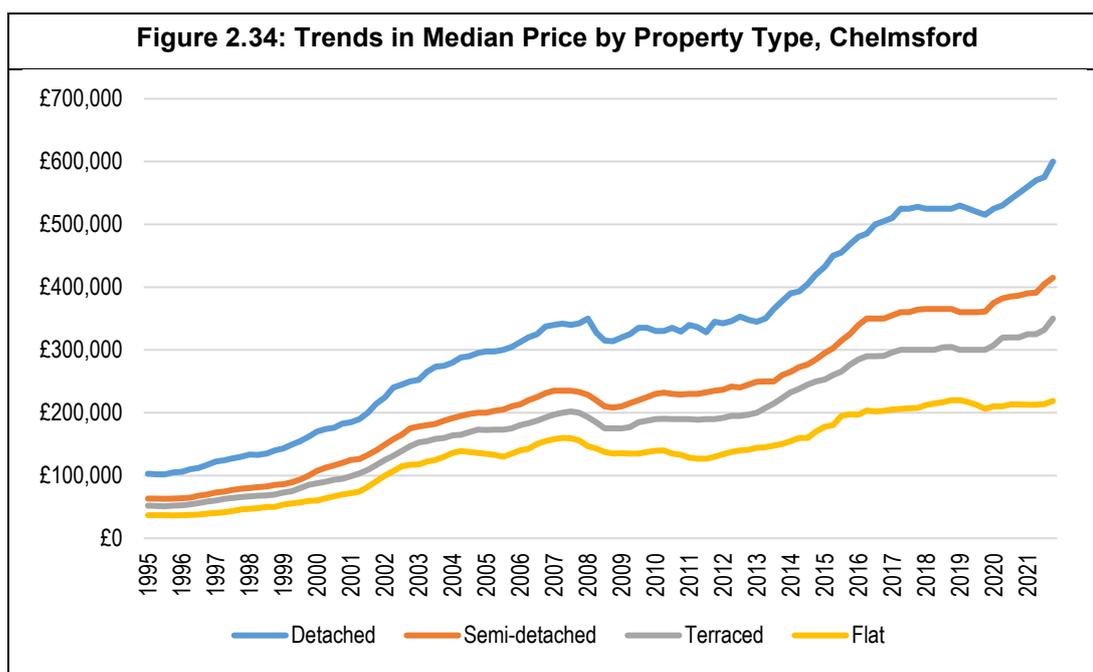
2.38 Relative to other areas, percentage house price increases in Chelmsford have been very slightly lower than seen across Essex and the East of England, however in actual cost terms, the change in Chelmsford has been notably higher. It is also notable that house prices in the City have increased at a faster rate in both percentage and actual cost terms than has been seen nationally.

Figure 2.33: Median House Price Change year ending September 2012 to year ending September 2022

	Year ending Sept 2012	Year ending Sept 2022	Change	% change
Chelmsford	£225,000	£385,000	£160,000	71.1%
Essex	£204,000	£352,000	£148,000	72.5%
East of England	£190,000	£328,000	£138,000	72.6%
England	£181,500	£275,000	£93,500	51.5%

Source: ONS Small Area House Price Statistics

2.39 Trends in the values of different types of properties in Chelmsford are shown in the figure below. It shows that in the longer-term, the strongest value growth has been for detached properties although all dwelling types have seen increased values. It is also notable that all dwelling types saw a drop in price through the early part of the 2008 recession, but that detached homes look to have been particularly affected by this.



Source: ONS Small Area House Price Statistics

- 2.40 The table below shows data for the last decade (to September 2022) – this shows all house types increasing by a broadly similar percentage, with the percentage increase for flats being somewhat slightly lower.

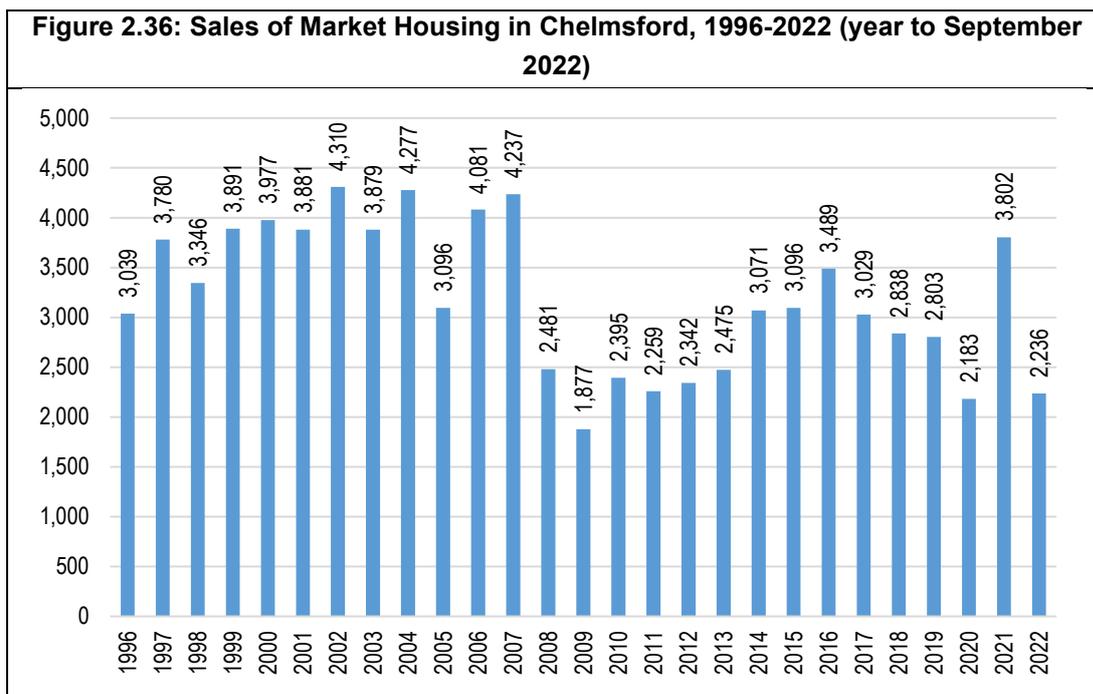
Figure 2.35: Median House Price Change year ending September 2012 to year ending September 2022 by dwelling type - Chelmsford

	Year ending Sept 2012	Year ending Sept 2022	Change	% change
Detached	£345,000	£600,000	£255,000	73.9%
Semi-detached	£235,000	£415,000	£180,000	76.6%
Terraced	£190,000	£350,000	£160,000	84.2%
Flat	£130,000	£218,750	£88,750	68.3%

Source: ONS Small Area House Price Statistics

Sales

- 2.41 Transaction levels (sales) reflect the relative buoyancy of the market and provide an indication of 'effective demand' for market housing. Sales volumes averaged about 3,900 per annum over the 10-year period to 2007. They fell dramatically as a result of the 'credit crunch', before picking up from 2012 onwards as availability of mortgage finance improved and as a result of Government support for the housing market. Sales of market housing in Chelmsford have however been trending down since 2016 (with the exception of a high number in 2021).
- 2.42 The drop in sales volumes seen since 2016 is likely to have been influenced by the effects of macro-economic uncertainty on the market – linked to Brexit – coupled with changes to mortgage interest relief which have affected the buy-to-let market. The most recent data will also be starting to pick up the impact of the war in Ukraine and associated 'cost of living crisis'.



Source: ONS Small Area House Price Statistics

Private Rental Values

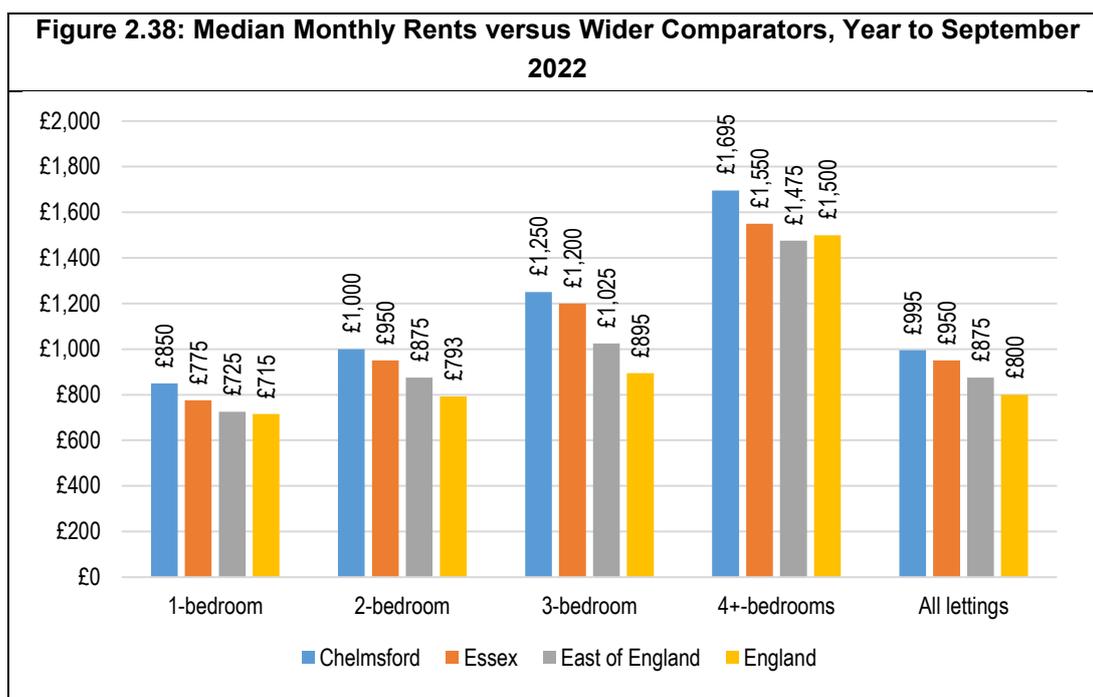
2.43 The analysis below reviews current private rents in Chelmsford against the County, regional and national average. The data is drawn from the ONS Private Rental Market Statistics. Median monthly rents vary from £500 for a room only let, up to £1,695 for 4+-bedroom properties in the City.

Figure 2.37: Monthly Rents in Chelmsford, Year to September 2022

	Mean	Lower Quartile	Median
Room	£522	£465	£499
Studio	£630	£550	£625
1-bed	£847	£750	£850
2-bed	£1,032	£895	£1,000
3-bed	£1,252	£1,100	£1,250
4+ bed	£1,714	£1,425	£1,695
All Lettings	£1,042	£850	£995

Source: ONS Private Rental Market Statistics

2.44 The median rent for all properties is 5% above the Essex average, 14% higher than the East of England average and 24% above the England average. Rents in Chelmsford for all property sizes are all above the national average. It is however notable that differences between areas for private rents are not as great as for sale prices – analysis earlier showed the average house price in the City Council area to be 40% higher than the national average, compared with private rents being ‘just’ 24% higher.



Source: ONS Private Rental Market Statistics

- 2.45 Analysis below has also sought to consider rental trends over the last 5 years to provide a relative indication of where there is a supply/demand imbalance. The evidence indicates that over this period rents have grown by an average of 33%. The strongest growth has been for smaller (1- and 2-bedroom) properties although the percentage increases do not really vary substantially across dwelling sizes. It should be noted the 'all lettings' figure will be influenced by the types of property let.

Figure 2.39: Median Rental Change in Chelmsford, 2016/17 – 2021/22

	2016/17	2021/22	Change	% Change
1-bedroom	£650	£850	£200	31%
2-bedrooms	£790	£1,000	£210	27%
3-bedrooms	£995	£1,250	£255	26%
4+-bedrooms	£1,350	£1,695	£345	26%
All Lettings	£750	£995	£245	33%

Source: ONS Private Rental Market Statistics

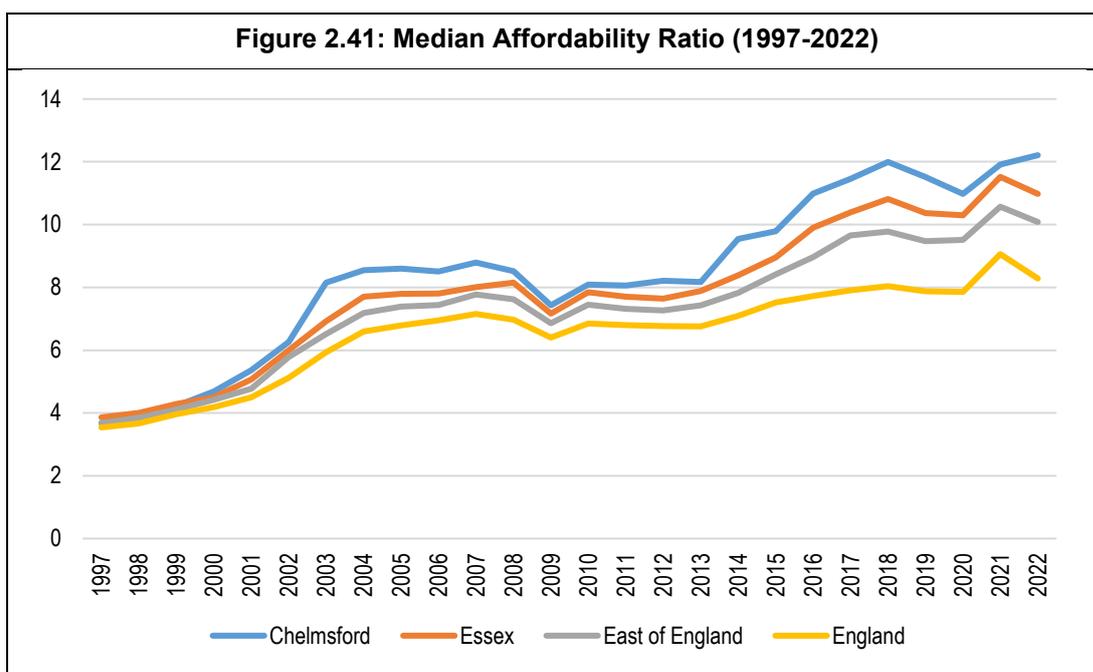
- 2.46 The table below compares changes in overall median private sector rents in Chelmsford with other locations. This shows substantially higher rental increases in Chelmsford than other locations. All other areas saw an average increase of £125 per month, with Chelmsford being almost double this figure.

	2016/17	2021/22	Change	% Change
Chelmsford	£750	£995	£245	33%
Essex	£825	£950	£125	15%
East of England	£750	£875	£125	17%
England	£675	£800	£125	19%

Source: ONS Private Rental Market Statistics

Market Affordability

2.47 The figure below shows median workplace-based affordability ratios over time. This is the ratio between median house prices and median earnings of those working in the City Council area. In all areas affordability has worsened between 1997 and 2022, Chelmsford now sees an affordability ratio of 12.21, which is worse than those seen in other locations. In terms of trends the Chelmsford and other area figures see a broad alignment although data for Chelmsford can be a bit more variable year-on-year – as the earnings estimates are derived from survey based data they can be prone to fluctuations particularly in smaller areas.



Source: ONS, Housing Affordability in England and Wales

Area Profile: Key Messages

- Analysis was carried out to provide background information about population and housing in Chelmsford. Data is compared with local, regional and national data as appropriate. The analysis can be summarised as covering three main topic headings:
 - Demographic baseline (including data on population age structure and changes);
 - Housing stock (including type and tenure); and
 - Housing market (including data on house prices)
- As of mid-2021, the population of Chelmsford is 181,800 and since 2011 the City Council area population has grown by around 8% which is a similar rate of growth as across Essex and the east of England, but a slightly faster rate than nationally. The City Council area also saw a similar level of population growth in the 2001-2011 period.
- The age structure of the population is also slightly different to other areas, with fewer people aged in their late teens and early 20s, and higher proportions in their late 30s and 40s. Over the past decade, the City Council area has seen an ageing of the population, with the number of people aged 65 and over increasing by 24%; there have however also been increases in the number of children and people of 'working-age' (taken to be 16-64)
- Population growth in the City Council area is largely driven by internal migration – moves from one part of the UK to another, although there are also generally positive levels of natural change (births minus deaths) and international migration.
- ONS dwelling stock data indicates there were 78,700 dwellings in the City Council area as of 2021, a net increase of 7,500 dwellings between 2011 and 2021. Rates of change in dwelling numbers have been in excess of that seen in other areas, and particularly the last 4-5 years.
- Some 71% of all households in the City Council area are owner-occupiers, notably higher than the national average of 62% (and higher than other benchmark areas), consequently the proportion of households living in the social rented (13%) and private rented (16%) sectors is lower than seen in other locations.
- The housing stock sees a relatively high proportion of detached homes, making up 30% of all dwellings (23% nationally) and related to this the stock is generally larger in nature, with around 29% having 4+-bedrooms. Again linked to this, the City Council area sees high levels of under-occupancy, with 42% of all households living in homes with at least two spare bedrooms. Levels of overcrowding are relatively low – at just 2.7% of all households.
- In the year to September 2022 the median house price in Chelmsford was £385,000. This is significantly above the median house price for comparator areas, and is 40% above the national average. Prices have also been increasing significantly, rising by 71% (£160,000) over the decade to September 2022. Over the past five years price rises have been more modest, increasing by 17%. When looking at median prices by property type, Chelmsford also typically sees higher prices for different types of property than Essex, the East of England region and England as a whole.
- As well as higher house prices, the City Council area typically sees higher private rental costs, with the median private rent for a 2-bedroom home standing at £1,000 per month in the year to September 2022. Rents overall are around 24% above the national average (compared with 40% when looking at median house prices). Over the past five years rents have increased by around 33%, higher than the increase in house prices over the same period.

Area Profile: Key Messages (cont...)

- In line with national trends, affordability in the City Council area has worsened with the workplace based median affordability ratio in Chelmsford at 12.21 in 2022 – this is based on the ratio between median house prices and full-time earnings.
- Overall, the data points to Chelmsford as an affluent area with higher house prices and large proportions of households living in owner-occupied housing. The City Council area also sees a housing mix of larger and detached homes. The analysis points to relatively high levels of housing demand. This can be seen in analysis of house prices and strong levels of delivery.
- That said, there are clearly issues suggested by the data. The house price to income ratio is high, pointing to potential difficulties in first-time-buyers (in particular) accessing the market – private rents are also high. At the same time, the relative lack of social rented housing means it will be difficult for the Council to meet affordable housing needs when they arise.

3. Overall Housing Need

Introduction

- 3.1 This section of the report considers overall housing need set against the framework of Planning Practice Guidance (PPG) – specifically the Standard Method for assessing housing need. The section also considers recent demographic trends to test if there are ‘exceptional circumstances’ that would point to the Standard Method as no longer being reasonable. Where projections are discussed in this section, the analysis generally looks at the 2023-33 period (as this fits with the Standard Method) although projections have also been developed to cover the 2022-41 emerging plan period.

Standard Method

- 3.2 The analysis below considers the level of local housing need for Chelmsford using the Standard Method. The methodology for calculating housing need is clearly set out by Government in Planning Practice Guidance and follows a four-step process worked through in the following sub-sections. We consider first the implications of use of the 2014-based Household Projections, the use of which is required in the Planning Practice Guidance.

Step One: Setting the Baseline

- 3.3 The first step in considering housing need against the Standard Method is to establish a demographic baseline of household growth. This baseline is drawn from the 2014-based Household Projections and should be the annual average household growth over a ten-year period, with the current year being the first year i.e. 2023 to 2033. This results in growth of 6,314 households (631 per annum) over the ten-year period.
- 3.4 Although this figure is calculated over a ten-year period from 2023 to 2033, Paragraph 12 of the PPG states that this average household growth and the local housing need arising from it can then “be applied to the whole plan period” in calculating housing need.

Step Two: Affordability Adjustment

- 3.5 The second step of the standard method is to consider the application of an uplift on the demographic baseline, to take account of market signals (i.e. relative affordability of housing). The adjustment increases the housing need where house prices are high relative to workplace incomes. It uses the published median affordability ratios from ONS based on workplace-based median house price to median earnings ratio for the most recent year for which data is available.
- 3.6 The latest (workplace-based) affordability data is for 2022 and was published by ONS in March 2023. The Government’s Guidance states that for each 1% increase in the ratio of house prices to earnings, above 4, the average household growth should be increased by 6.25%, with the calculation being shown below. For Chelmsford, the ratio for 2022 was 12.21, giving an uplift of 51% - this leads to a housing need of 955 dwellings per annum.

$$\text{Adjustment factor} = \left(\frac{\text{Local affordability ratio} - 4}{4} \right) \times 0.25 + 1$$

Step Three: The Cap

- 3.7 The third step of the Standard Method is to consider the application of a cap on any increase and ensure that the figure which arises through the first two steps does not exceed a level which can be delivered. There are two situations where a cap is applied:
- The first is where an authority has reviewed their plan (including developing an assessment of housing need) or adopted a plan within the last five years. In this instance the need may be capped at 40% above the requirement figure set out in the plan.
 - The second situation is where plans and evidence are more than five years old. In such circumstances a cap may be applied at 40% of the higher of the projected household growth (step 1) or the housing requirement in the most recent plan, where this exists.
- 3.8 The Chelmsford Local Plan was adopted in May 2020 (i.e. within the last 5 years). The cap is therefore calculated as 40% above the housing target in that plan (805 dwellings per annum). The outcome of Step 2 is lower than the capped figure (local plan target plus 40%). Therefore, regardless of the date of adoption of the local plan, the capping in this case does not impact the level of housing need in Chelmsford.

Step Four: Urban Uplift

- 3.9 The fourth and final step in the calculation means that the 20 largest urban areas in England are subject to a further 35% uplift. This uplift ensures that the Government's stated target of 300,000 dwellings per annum is met and that "homes are built in the right places, to make the most of existing infrastructure, and to allow people to live nearby the service they rely on, making travel patterns more sustainable." (Paragraph: 035 Reference ID: 2a-035-20201216). Chelmsford is not listed within the top 20 urban areas in the country and therefore there is no additional uplift.

Standard Method Calculation using 2014-based Household Projections

- 3.10 The table below works through the Standard Method calculations for the City Council area and shows a need for 955 dwellings per annum.

Figure 3.1: Standard Method Housing Need Calculations using 2014-based Household Projections	
	Chelmsford
Households 2023	78,037
Households 2033	84,351
Change in households	6,314
Per annum change	631
Affordability ratio (2022)	12.21
Uplift to household growth	51%
Uncapped need (per annum)	955

Source: Derived from a range of ONS and MHCLG sources

Divergence from the Standard Method (Exceptional Circumstances)

- 3.11 The table above sets out housing need using the Standard Method and whilst this is a relevant consideration Planning Practice Guidance does allow for divergence from these figures (in both an upward and downward direction) where exceptional circumstances can be demonstrated. An important start point is to understand Government Guidance on this topic. This can be found in Planning Practice Guidance 2a and below are some key quotes for the purposes of this document.

“Is the use of the standard method for strategic policy making purposes mandatory?”

No, if it is felt that circumstances warrant an alternative approach but authorities can expect this to be scrutinised more closely at examination. There is an expectation that the standard method will be used and that any other method will be used only in exceptional circumstances.” - Paragraph: 003 Reference ID: 2a-003-20190220.

“If authorities use a different method how will this be tested at examination?”

Where an alternative approach results in a lower housing need figure than that identified using the standard method, the strategic policy-making authority will need to demonstrate, using robust evidence, that the figure is based on realistic assumptions of demographic growth and that there are exceptional local circumstances that justify deviating from the standard method. This will be tested at examination. Any method which relies on using household projections more recently published than the 2014-based household projections will not be considered to be following the standard method.” - Paragraph: 015 Reference ID: 2a-015-20190220 (whole paragraph not replicated).

- 3.12 Paragraph 2a-010 also sets out circumstances where it might be appropriate to plan for a higher housing need figure than the standard method indicates; this includes noting that the method ‘does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates’. In Chelmsford, economic growth potential (increases in jobs) could put pressure on the need to provide housing delivery in excess of the Standard Method, and this is discussed later in this report.

- 3.13 Regarding demographic trends and projections, the guidance is therefore quite clear: there is an expectation that the 2014-based sub-national household projections (SNHP) should be used but that an alternative approach can be applied where relevant. When using an alternative approach, it is necessary to take account of demographic growth and market signals, but this cannot include using more recent versions of published SNHP. The PPG does not specifically set out examples of exceptional circumstances but it is considered that there are likely to be two main considerations:
- Firstly that demographic data on which projections are based is demonstrably wrong and cannot realistically be used for trend-based projections on which the Standard Method is based; and
 - Secondly that demographic trends have changed so much that it is unrealistic to use a set of projections based on information in a trend period to 2014, which is now over 8-years old.
- 3.14 The analysis below principally focuses on the second of the two bullet points above before moving on to look at what might be seen as a reasonable trend-based projection using available information. The focus is particularly on population projections and the report does not seek to challenge the market signals element of the Standard Method with the latest figures published affordable by ONS being used to generate estimates of need. The first analysis below briefly considers the validity of the 2014-based projections.

2014-based projections and more recent demographic trends

- 3.15 Above it was noted that one exceptional circumstance might be that the 2014-based subnational household projections (SNHP) that underpin the Standard Method are clearly wrong – in this instance we are looking to consider if the trends that have actually occurred are substantially different from those projected back in 2014. One way of considering this is to compare data for 2021 with recently published Census data and also MYE data (prior to a Census adjustment). Comparisons are made for both population (as this underpins the household projections) and household estimates.
- 3.16 The table below shows population figures for 2011 and 2021 from these sources – a start point of 2011 is used as it is the last consistent estimate for all three sources studied. The data shows the 2014-based projections had projected the population of Chelmsford to reach 180,106 by 2021 and ONS in their monitoring of data had actually estimated a very slightly higher population figure (180,290). Following publication of the 2021 Census, ONS has revised upwards slightly its estimate of population in 2021 to 181,763, potentially suggesting the 2014-SNPP did under estimate population change.
- 3.17 Overall, it is however not considered that the difference between sources, including more up-to-date information point to an exceptional circumstance such that the 2014-based projection could be rejected as not showing a realistic level of population change. Whilst the Census shows higher growth from 2011, it is the case that differences are fairly minor, and the Census (as with unadjusted MYE data) does potentially have some degree of error associated with it.

	2011	2021	Change	% change
2014-based SNPP/SNHP	168,491	180,106	11,615	6.9%
MYE (unadjusted)	168,491	180,290	11,799	7.0%
MYE (adjusted for Census)	168,491	181,763	13,272	7.9%

Source: ONS

- 3.18 In terms of more recent trends, we can also look at household changes as projected in the 2014-SNHP and as now shown by the Census, this is shown in the table below. This shows slightly lower growth in the Census than was projected in the 2014-based data – this difference is in the opposite direction to population data and is again not considered to be substantial and does not point to any exceptional circumstance regarding more recent trends.

	2011	2021	Change	% change
2014-based SNPP/SNHP	69,755	76,696	6,941	10.0%
Census	69,667	75,404	5,737	8.2%

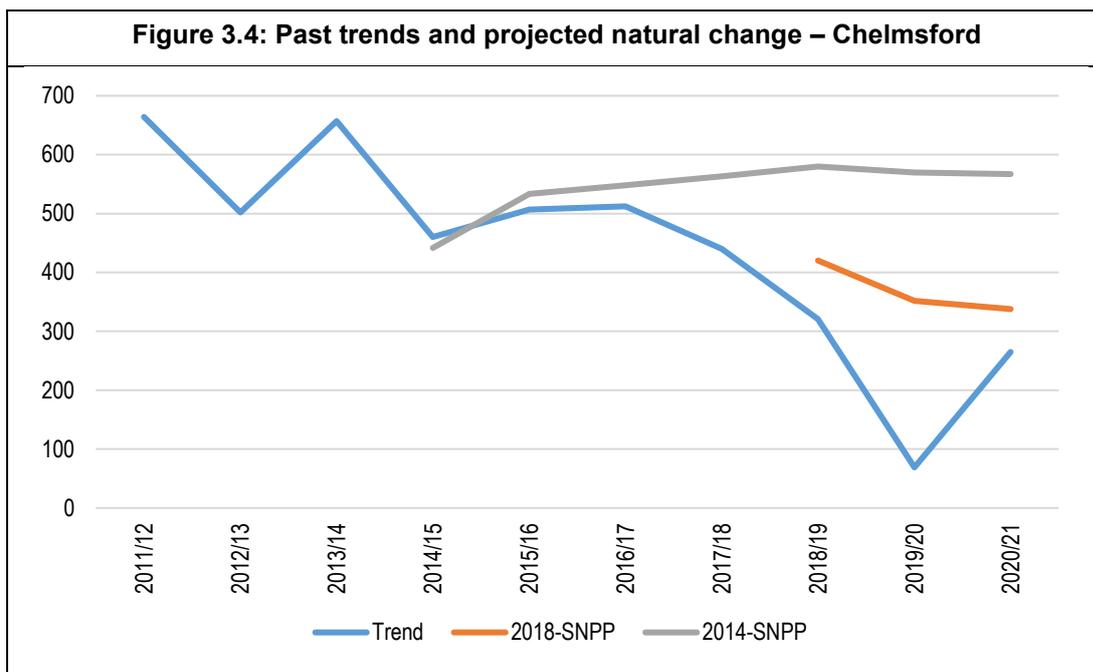
Source: ONS

Components of Change

- 3.19 Although concluding that different population change estimates do not point to anything 'exceptional', it is however of interest to look at how the components of population change differ between the 2014-SNPP and more recent estimates. Whilst this analysis is not being specifically used to consider exceptional circumstances it does help to understand if there have been changes in population dynamics that should be recognised moving forward.

Natural Change

- 3.20 The figure below shows past trends in natural change (going back to 2011) and how this was projected forward in the 2014-SNPP. The data is clear that natural change has been falling but that the 2014-SNPP did not pick up on this trend (projecting forward a relatively flat level of natural change). The most recent (2018-based) SNPP does seem to have recognised this reduced level of natural change although actual trends have been lower than even this reduction.



Source: ONS

3.21 The table below shows the above data along with averages for relevant time periods. This confirms the reduction in natural change over time and shows natural change in the past 7-years to have been an average of 368 per annum, notably below the projected level in 2014-based projections. The analysis also shows a lower level of natural change in the 2018-SNPP but that recent trends suggest it has been even lower.

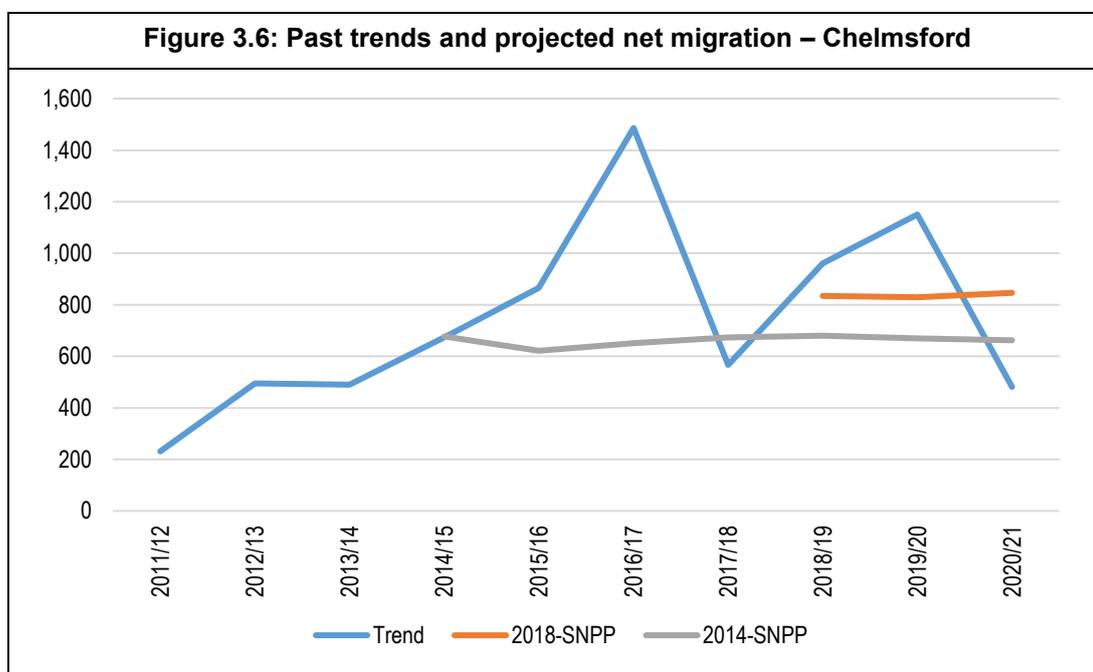
	MYE Trend	2014-based	2018-based
2011/12	664	-	-
2012/13	502	-	-
2013/14	657	-	-
2014/15	460	442	-
2015/16	507	533	-
2016/17	512	548	-
2017/18	440	563	-
2018/19	321	580	420
2019/20	69	570	352
2020/21	265	567	338
Average (2014-21)	368	543	-
Average (2018-21)	218	572	370

Source: ONS

- 3.22 Natural change is lower because of a combination of lower births, which could potentially be influenced by housing supply constraints as households are unable to set up independent households until later in life; but also increases in life expectancy which have not been as strong as predicted in the 2014-based Household Projections (and therefore higher mortality). These are factors seen in more recent data nationally, rather than trends specific to Chelmsford. There is also the possibility of a Covid-related spike in deaths within the data for the City Council area (as nationally).

Net migration

- 3.23 The figure below shows the same information for net migration which is more variable on a year by year basis than natural change. Net migration is the balance between in- and out-migration. Based on the (pre-Census) MYE trend data, net migration has generally been increasing (albeit with year-on-year variability) and this does seem to have been picked up to some degree by the most recent (2018-based) projections.



Source: ONS

- 3.24 The table below shows the same data for each year and selected averages. This shows the MYE trend being higher than the projected levels in the 2014-SNPP. This analysis also highlights the 2018-SNPP as showing a similar level of net migration into Chelmsford over the past three years as have been seen in past trends based on the MYE estimates (albeit without the year-on-year variation).

Figure 3.7: Net Migration Trends and Projections – Chelmsford			
	MYE Trend	2014-based	2018-based
2011/12	231	-	-
2012/13	495	-	-
2013/14	490	-	-
2014/15	673	677	-
2015/16	865	621	-
2016/17	1,486	651	-
2017/18	567	674	-
2018/19	961	680	834
2019/20	1,150	670	829
2020/21	481	662	846
Average (2014-21)	883	662	-
Average (2018-21)	864	671	837

Source: ONS

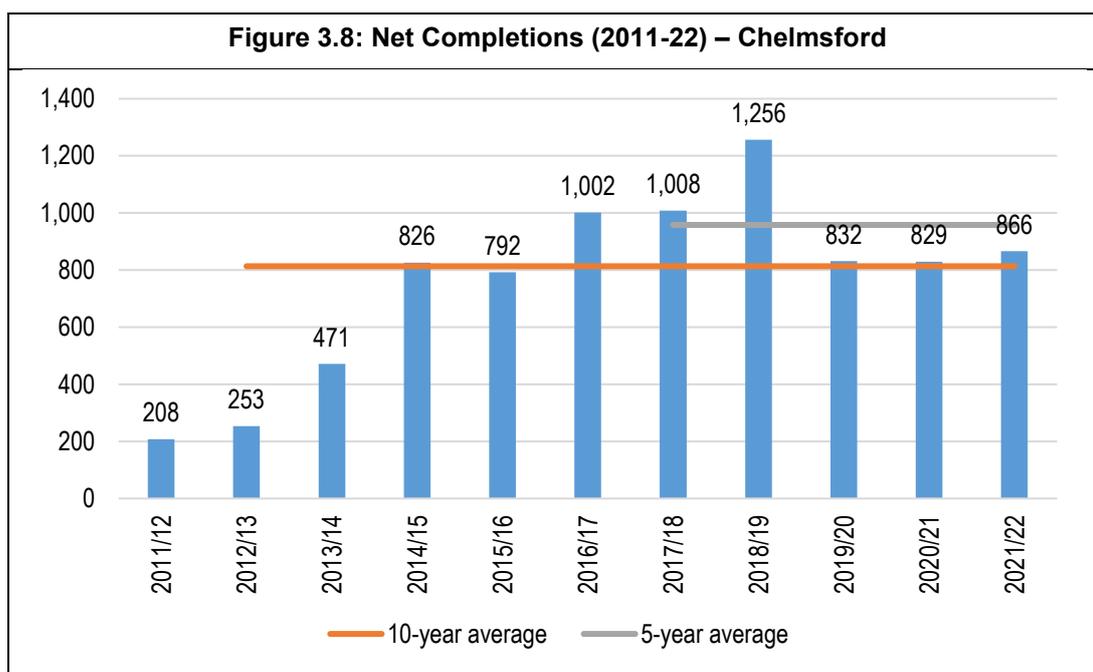
- 3.25 However, it should also be noted that there is a difference of 1,473 people between MYE data (as estimated by ONS) and MYE once adjusted for the Census. ONS in making adjustments for this difference would call it Unattributable Population Change (UPC) in that they do not know which component of change it relates to, or if it relates to errors in Census counts (either in 2011 or 2021). It is possible that the difference could be attributed to errors in the recording of migration – i.e. migration to Chelmsford could have been under-estimated. ONS does recognise that migration is more difficult to accurately measure than other components of population change.

Past build rates

- 3.26 The next sub-section uses information about past trends to consider what a (2021-based) trend-based projection might look like. However before doing this, the report has sought to consider if past housing delivery is a factor to be considered when looking at housing need. This is a key part of the PPG, which says (2a-010):

'There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method... Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests'

- 3.27 The figure below shows housing completions over the period from 2011 to 2022 – this shows average completions of 814 per annum over the past decade and a higher figure of 958 per annum over the past 5-years. Generally, these figures would point to a housing need of 955 per annum as being reasonable – supply has not consistently exceeded the Standard Method and in recent years is virtually identical to the Standard Method need.



Source: DLUHC

Developing Trend-Based Projections

- 3.28 The purpose of this section is to develop trend-based population projections. A key driver of this is due to publication of new (2021) Census data which has essentially reset estimates of population (size and age structure) compared with previous mid-year population estimates (MYE) from ONS (ONS has subsequently updated 2021 MYE figures to take account of the Census).
- 3.29 It is also the case the 2014-based projections from which the Standard Method is based are now over eight years old and even more recent projections (2018-based being the most recent) pre-date the Census (and MYE data to 2021).
- 3.30 The analysis seeks to provide projections rebased to 2021 (Census data) and draws on ONS MYE data up to 2021 – including data about births, deaths and migration. The trend-based projections have been developed so that further analysis in the report can readily be undertaken. For example, when looking at older persons' needs it is necessary to understand how the older person population might grow and for the mix of housing a model has been used that looks at the implications of demographic change.
- 3.31 Four projections have been developed looking at estimated migration trends over the past 5- and 10-years. A 5-year period has been chosen as it is consistent with the time period typically used by ONS when developing subnational population projections whilst 10-years has been used as it fits with the period between the two Census, and arguably the longer period can provide more stable outputs.

3.32 Within the 5- and 10-year projection categories, two projections have been developed, these are to look at population growth in the period to 2021 as recorded by the MYE second is based on the MYE to 2021 once corrected for Census data (under the broad assumption that UPC can be attributed to migration). The four projections can be summarised as:

- 5-year trend using migration estimates in the MYE for the 2016-21 period;
- 10-year trend using migration estimates in the MYE for the 2011-21 period;
- 5-year trend taking account of population growth shown by the Census for 2011-21; and
- 10-year trend taking account of population growth shown by the Census for 2011-21.

3.33 Below the general method used for each of the components and the outputs from a trend based projection are set out. The latest ONS projections are a 2018-based set of SNPP and whilst these are not directly used in the analysis, reference is made to allow comparisons between the ONS position (which was pre-Census) and projections developed below.

Natural change

3.34 Natural change is made up of births and deaths and analysis above has shown a general downward trend over time. To project trends forward the analysis looks at each of births and deaths separately and compares projected figures in the 2018-SNPP with actual recorded figures in the MYE. The analysis also takes account of differences between the estimated population size and structure in 2021 (in the 2018-SNPP) and the ONS MYE (as revised to take account of Census data). Overall, it is estimated recent trends in fertility are lower than figures in the 2018-SNPP with mortality rates typically being slightly higher.

Migration

3.35 When looking at migration our start point is to consider levels of migration over the past 5-years (2016-21). Analysis also seeks to determine a baseline start position for each of in- and out-migration and to do this data from MYE up to 2021 has been used. To be consistent with the methodology used by ONS when developing SNPP data for the previous five years has been studied (with a 10-year trend sensitivity). Information about migration estimates is shown in the table below with average figures provided for 2016-21 (latest 5-years) and 2011-21 (10-years).

	Internal (domestic)	International	All net migration
2011/12	-76	307	231
2012/13	289	206	495
2013/14	114	376	490
2014/15	37	636	673
2015/16	463	402	865
2016/17	1,244	242	1,486
2017/18	344	223	567
2018/19	668	293	961
2019/20	759	391	1,150
2020/21	299	182	481
Average (2016-21)	663	266	929
Average (2011-21)	414	326	740

Source: ONS

- 3.36 As with fertility and mortality data, the information above has been used to make adjustments to the 2018-based SNPP to reflect recent trends – this has been done separately for both internal and international migration.
- 3.37 The figures in the table above are for migration as recorded by ONS in their mid-year population estimates. It has previously been noted that the MYE estimated population in 2021 to be around 1,473 people lower than has now been shown by the Census (180,290 vs. 181,763). For the purposes of the sensitivities around Census growth based projections it has been modelled that the difference between the two figures can be attributed to migration, and hence as a projection start point, migration is assumed to be around 147 people higher each year (net).

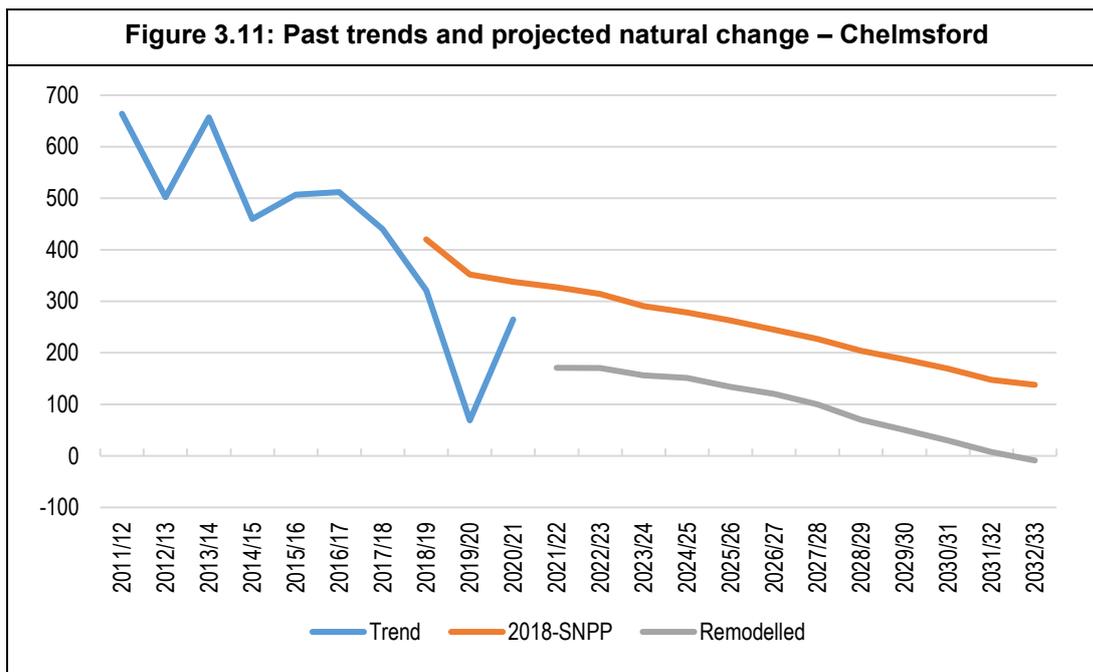
City-wide Projection Outputs

- 3.38 The above estimates of fertility, mortality and migration (including changes over time) have been modelled to develop a projection for the period to 2033 – this date being chosen as it is consistent with the period used when studying the Standard Method. The table below shows projected population growth for each of the scenarios. These show population increases of between 4% and 6% (7,800 to 10,900 people). The figures can be put in the context of past trends, with the Census based MYE showing growth of 13,300 people over a 10-year period.

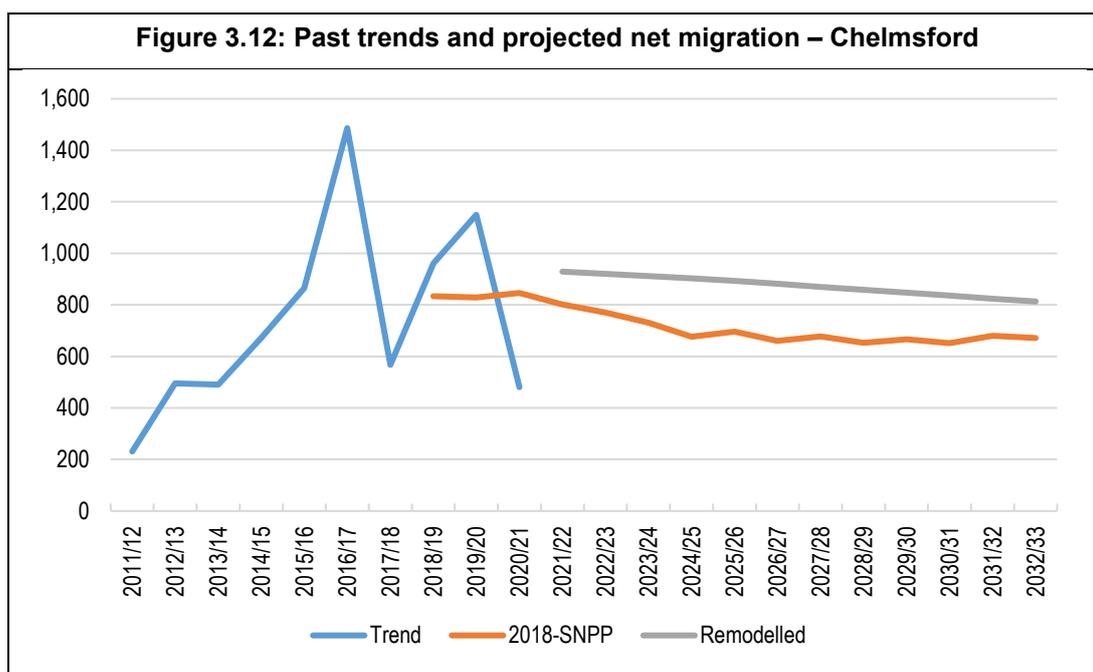
	Population 2023	Population 2033	Change	% change
5-year trend (MYE)	183,962	193,459	9,497	5.2%
10-year trend (MYE)	183,587	191,387	7,800	4.2%
5-year trend (Census)	184,255	195,121	10,866	5.9%
10-year trend (Census)	183,880	193,072	9,192	5.0%

Source: Demographic projections

- 3.39 It is difficult to say which scenario is the most realistic but taking everything in the round it is considered that the first 5-year trend projection is probably the best of the scenarios in methodological terms. This is because this scenario uses the time period and data ONS would be using if developing a new projection – ONS would be unlikely to model the implications on migration of Census data.
- 3.40 Below are a series of charts showing key components of change (using the 5-year trend (MYE) projection). For contrast, data is compared with that from the 2018-based SNPP, that being the most recent projection released by ONS.



Source: ONS and demographic projections



Source: ONS and demographic projections

Household Projections

- 3.41 The final part of the projection is to convert population estimates into households by discounting the communal population (to give a household population) and then applying household representative rates (HRR). The first analysis is however to estimate the number of households as of 2021.
- 3.42 The 2021 Census showed a total of 75,400 households and this has been used as a base figure. However, it should be noted that the Census figure is for March whereas the projections typically use mid-year as a data point. This is only a small difference but does mean that the actual estimate of households in mid-2021 will be slightly different. For the purposes of projecting forward, this will however have a negligible impact on figures.
- 3.43 By applying the population age structure (by sex) to HRRs (taken from the 2018-SNHP) it is possible to estimate households, the HRRs are then adjusted to match the 75,400 estimate (rolled forward to mid-year) and then these revised HRRs can be applied to the population projections.
- 3.44 The analysis projects an increase of between 496 and 611 households per annum over the 2023-33 period with the 5-year trend (MYE) projection showing a figure of 559 per annum.

Figure 3.13: Projected change in households – range of scenarios

	Households 2023	Households 2033	Change in households	Per annum
5-year trend (MYE)	76,634	82,228	5,594	559
10-year trend (MYE)	76,502	81,458	4,956	496
5-year trend (Census)	76,737	82,844	6,108	611
10-year trend (Census)	76,605	82,084	5,478	548

Source: Demographic projections

Standard Method using alternative trend-based projections

- 3.45 The analysis below calculates housing need using the Standard Method, but replacing the 2014-based SNHP with the alternative projections shown above. With the preferred projection, the need is lower than the analysis using 2014-based projections, with a need shown for around 846 dwellings per annum (compared with 955) – although the need is as high as 924 per annum under the highest scenario.

Figure 3.14: Standard Method Housing Need Calculations using revised demographic projections

	5-year trend (MYE)	10-year trend (MYE)	5-year trend (Census)	10-year trend (Census)
Households 2023	76,634	76,502	76,737	76,605
Households 2033	82,228	81,458	82,844	82,084
Change in households	5,594	4,956	6,108	5,478
Per annum change	559	496	611	548
Affordability ratio (2022)	12.21	12.21	12.21	12.21
Uplift to household growth	51%	51%	51%	51%
Need (per annum)	846	750	924	829

Source: Derived from a range of ONS and MHCLG sources

- 3.46 Overall, it is considered that demographic trends do not point to a housing need above the Standard Method – arguably a lower figure could be used, although it is not considered that the difference between 846 and 955 is exceptional.

Developing a Projection linking to the Standard Method

- 3.47 The data above suggests the Standard Method is a reasonable number to use in estimating housing need for the City Council area and it is worthwhile looking at how population might change if providing this level of homes. A bespoke projection has been developed, linking to provision of 955 dwellings per annum, and this projection is then used for other analysis in the report (including looking at the mix of housing).
- 3.48 A scenario has been developed which flexes migration to and from Chelmsford such that there is sufficient population for 955 additional homes each year. The modelling links to 2018-based population and household projections and also rebases population and households to the levels shown in the 2021 Census (and subsequent MYE). Within the modelling, migration assumptions have been changed so that across the City Council area the increase in households matches the housing need (including a standard 3% vacancy allowance). Adjustments are made to both in- and out-migration (e.g. if in-migration is increased by 1% then out-migration is reduced by 1%).
- 3.49 A further adjustment has been made to deal with any suppression of household formation within the projections. To do this a ‘part-return-to-trend’ analysis has been developed, where the rate of household formation sits somewhere between figures in the 2018-based projections and equivalent data for 2001 (a period when the housing market was arguably less suppressed). This general approach has been widely used in analysis of this nature and was an approach previously suggested by the Local Plans Expert Group (LPEG).

- 3.50 In developing this projection, the population is projected to increase by 34,700 people – the strongest increase being in the 16-64 age group, although in proportionate terms the strongest growth is in people aged 65 and over (a 35% increase over the 19-years).

**Figure 3.15: Population change 2022 to 2041 by broad age bands – Chelmsford
(linked to Standard Method)**

	2022	2041	Change in population	% change from 2022
Under 16	33,976	38,713	4,738	13.9%
16-64	113,913	131,381	17,469	15.3%
65 and over	35,790	48,272	12,481	34.9%
Total	183,678	218,366	34,688	18.9%

Source: Demographic Projections

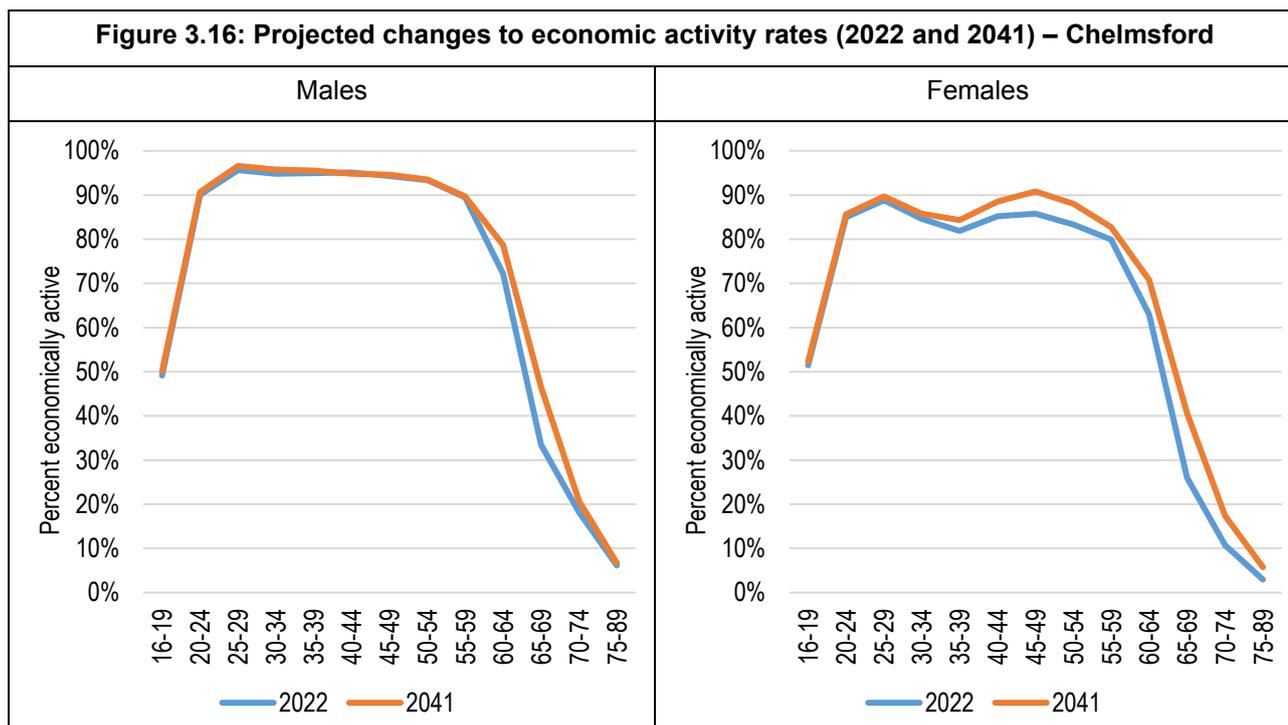
Relationship Between Housing and Economic Growth

- 3.51 The analysis to follow considers the relationship between housing and economic growth; seeking to understand what level of jobs might be supported by changes to the local labour supply (which will be influenced by population change). To look at estimates of the job growth to be supported, a series of stages are undertaken. These can be summarised as:

- Estimate changes to the economically active population (this provides an estimate of the change in labour-supply);
- Overlay information about commuting patterns, double jobbing (i.e. the fact that some people have more than one job) and potential changes to unemployment; and
- Bringing together this information will provide an estimate of the potential job growth supported by the population projections.

Growth in Resident Labour Supply

- 3.52 The approach taken in this report is to derive a series of age and sex specific economic activity rates and use these to estimate how many people in the population will be economically active as projections develop. This is a fairly typical approach with data being drawn in this instance from the Office for Budget Responsibility (OBR) – July 2018 (Fiscal Sustainability Report) – this data has then been rebased to information in the 2011 Census (on age, sex and economic activity) and the 2021 (for an updated number of people who are economically active).
- 3.53 The figure and table below show the assumptions made for the City Council area. The analysis shows that the main changes to economic activity rates are projected to be in the 60-69 age groups – this will to a considerable degree link to changes to pensionable age, as well as general trends in the number of older people working for longer (which in itself is linked to general reductions in pension provision).



Source: Based on OBR and Census (2011 and 2021) data

Figure 3.17: Projected changes to economic activity rates (2022 and 2041) – Chelmsford

	Males			Females		
	2022	2041	Change	2022	2041	Change
16-19	49.2%	50.1%	0.9%	51.5%	52.3%	0.9%
20-24	90.0%	90.7%	0.6%	85.0%	85.6%	0.6%
25-29	95.6%	96.6%	1.0%	88.8%	89.7%	0.9%
30-34	94.8%	95.7%	0.9%	84.6%	85.8%	1.1%
35-39	95.0%	95.5%	0.5%	81.9%	84.3%	2.4%
40-44	95.1%	94.8%	-0.3%	85.2%	88.5%	3.3%
45-49	94.3%	94.6%	0.3%	85.8%	90.8%	5.0%
50-54	93.3%	93.5%	0.1%	83.3%	88.0%	4.7%
55-59	89.4%	89.7%	0.2%	79.9%	82.7%	2.8%
60-64	72.2%	78.7%	6.5%	63.0%	70.8%	7.8%
65-69	33.5%	46.5%	13.1%	26.0%	40.6%	14.7%
70-74	18.2%	20.8%	2.6%	10.7%	17.4%	6.7%
75-89	6.1%	6.7%	0.5%	2.9%	5.8%	2.8%

Source: Based on OBR and Census (2011 and 2021) data

3.54 Working through an analysis of age and sex specific economic activity rates it is possible to estimate the overall change in the number of economically active people in the City Council area – this is set out in the table below. The analysis shows that the projection linked to the Standard Method results in growth in the economically-active population of 21,200 people – a 21% increase.

Figure 3.18: Estimated change to the economically active population (2022-41) – Chelmsford				
	Economically active (2022)	Economically active (2041)	Total change in economically active	% change
Trend-based	99,923	110,715	10,792	10.8%
Standard Method	100,378	121,544	21,166	21.1%

Source: Derived from demographic projections

Linking Changes to Resident Labour Supply and Job Growth

3.55 The analysis above has set out potential scenarios for the change in the number of people who are economically active. However, it is arguably more useful to convert this information into an estimate of the number of jobs this would support. The number of jobs and resident workers required to support these jobs will differ depending on three main factors:

- Commuting patterns – where an area sees more people out-commute for work than in-commute it may be the case that a higher level of increase in the economically active population would be required to provide a sufficient workforce for a given number of jobs (and vice versa where there is net in-commuting);
- Double jobbing – some people hold down more than one job and therefore the number of workers required will be slightly lower than the number of jobs; and
- Unemployment – if unemployment were to fall then the growth in the economically active population would not need to be as large as the growth in jobs (and vice versa).

Commuting Patterns

3.56 The table below shows summary data about commuting to and from Chelmsford from the 2011 Census. Overall, the data shows the City Council area sees a level of net out-commuting for work with the number of people resident in the area who are working being about 5% higher than the total number who work in the area. This number is shown as the commuting ratio in the final row of the table and is calculated as the number of people living in an area (and working) divided by the number of people working in the area (regardless of where they live).

Figure 3.19: Commuting patterns (2011)	
	Chelmsford
Live and work in Local Authority (LA)	36,228
Home workers	9,002
No fixed workplace	7,265
In-commute	30,605
Out-commute	34,430
Total working in LA	83,100
Total living in LA (and working)	86,925
Commuting ratio	1.046

Source: 2011 Census

- 3.57 In translating the commuting pattern data into growth in the labour-force, a core assumption is that the commuting ratio remains at the same level as shown by the 2011 Census. A sensitivity has also been developed where commuting for new jobs is assumed to be on a 1:1 ratio (i.e. the increase in the number of people working in the area is equal to the number of people living in the area who are working).

Double Jobbing

- 3.58 The analysis also considers that a number of people may have more than one job (double jobbing). This can be calculated as the number of people working in the local authority divided by the number of jobs. Data from the Annual Population Survey (available on the NOMIS website) for the past 5-years suggests across the City Council area that typically about 2.2% of workers have a second job.
- 3.59 For the purposes of this assessment it has been assumed that around 2.2% of people will have more than one job moving forward. A double jobbing figure 2.2% gives rise to a ratio of 0.978 (i.e. the number of jobs supported by the workforce will be around 2.2% higher than workforce growth). It has been assumed in the analysis that the level of double jobbing will remain constant over time.

Unemployment

- 3.60 The last analysis when looking at the link between jobs and resident labour supply is a consideration of unemployment. Essentially, this is considering if there is any latent labour force that could move back into employment to take up new jobs. This is particularly important given there is likely to have been notable increases in unemployment due to Covid-19, although it will be difficult to be precise about numbers. Given the estimates of economic activity and job growth are taken from 2022 it is considered that there is no need to include a further adjustment to take account of the pandemic. Essentially it is assumed that people who lost employment through the pandemic will now be back in work (where they are seeking work) and so there is no latent labour supply available to fill additional jobs.

Jobs Supported by Growth in the Resident Labour Force

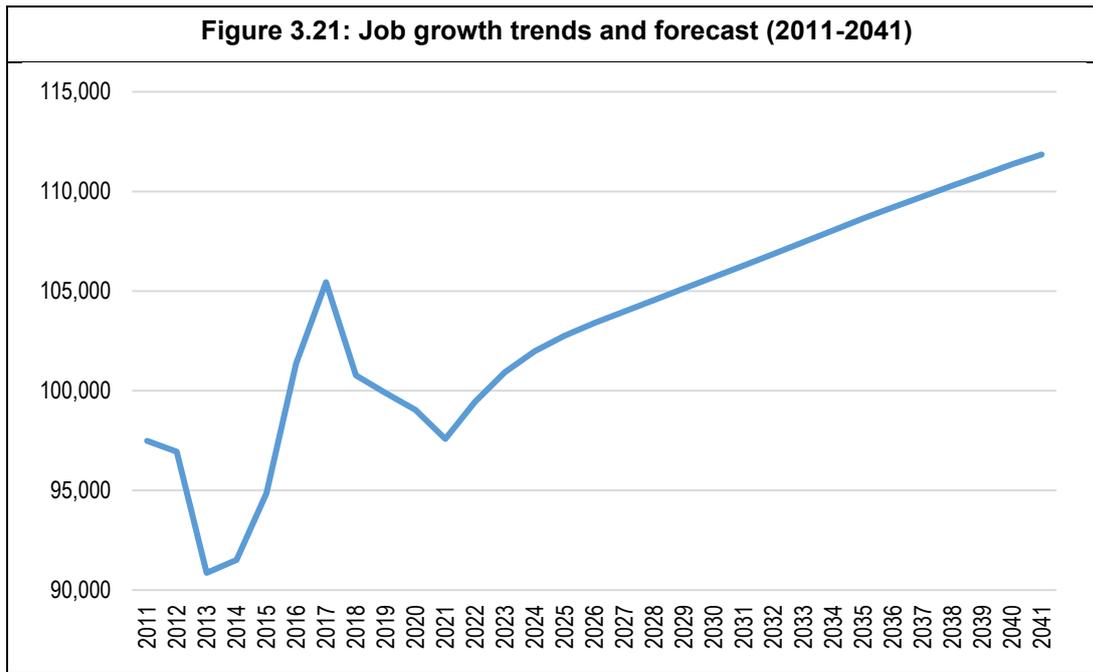
- 3.61 The table below shows how many additional jobs might be supported by population growth under the Standard Method projection. Given estimates about double jobbing and different commuting pattern scenarios it is estimated that around 20,700 and 21,600 additional jobs could be supported by the changes to the resident labour supply. If modelling against the preferred trend-based projection, the number of jobs potentially supported is lower (around 11,000 with 2011 commuting patterns).

		Total change in economically active	Allowance for double jobbing	Allowance for net commuting (= jobs supported)
Trend-based	Census commuting	10,792	11,035	10,549
	1:1 commuting	10,792	11,035	11,035
Standard Method	Census commuting	21,166	21,642	20,689
	1:1 commuting	21,166	21,642	21,642

Source: Derived from a range of sources

Economic Growth and Housing Need – Job Forecasts

- 3.62 To look at estimates of the numbers of homes required to support jobs growth, the method which is followed is identical to that set out for translating homes into jobs but completed in reverse to get to a population growth.
- 3.63 This level of population growth is then applied to the household formation rates developed earlier in this report to get to a household growth. A final adjustment to reflect a level of vacancy in the housing stock is applied to the household growth to get to dwelling growth. The stages can be summarised as:
- Start with estimates of job growth;
 - Estimate changes required to the economically active population to meet the jobs growth – this takes account of information about commuting patterns, double jobbing (i.e. the fact that some people have more than one job) and potential changes to unemployment;
 - Flex levels of migration within the demographic model so that the change in the economically active population equals the change required to meet the number of jobs (migration can be 'flexed' up or down with stronger economic growth resulting in higher net in-migration as more people are required in the labour-supply); and
 - Apply household representative rates to the resulting population projection and apply a vacancy allowance to calculate the number of households and dwellings needed.
- 3.64 A job forecast has been accessed that suggests a potential increase from 99,434 jobs in 2022, up to 111,852 by 2041 – an increase of 12,400 jobs over the 19-year period (654 per annum). Past trends and the future job forecast is shown on the figure below.



Source: Cambridge Econometrics

Economic Growth and Housing Need

- 3.65 The demographic model developed to look at housing need has been used to consider the link between jobs and housing. Within the modelling, migration assumptions have been changed so that the increase in the economically active population matches the increase in the resident workforce required. Adjustments are made to both in- and out-migration (e.g. if in-migration is increased by 1% then out-migration is reduced by 1%).
- 3.66 In line with earlier assumptions on changes in economic participation and commuting, we assume an increase in the resident workforce in line with the growth in people in employment (i.e. a 1:1 ratio between growth in people working in Chelmsford and residents in work) as well as modelling a continuation of commuting dynamics shown by the 2011 Census. The analysis also assumes that 2.2% of people hold down more than one job.
- 3.67 The modelling also builds in assumptions on changes to economic participation taking account of increased longevity and later retirement. Assumptions from the Office for Budget Responsibility's 2018 Fiscal Sustainability Report have been adopted, which shows some increased economic participation in those in their 60s in particular (and particularly amongst females).
- 3.68 Once the level of economically active population matches the job growth forecast, the population (and its age structure) is modelled against the HRRs, using the HRRs with a 'part return to trend' adjustment to headship rates. The assumptions assume affordability improves in order to support improved household formation amongst younger households, moving back towards longer-term trends over time. A 3% vacancy allowance is then included in relating household growth to housing need, consistent with the approach earlier in this report.

- 3.69 The first part of the analysis is to estimate what level of growth in the labour supply would be needed for the job growth forecast to be met. This calculation is shown below; there are two scenarios with differing assumptions about commuting patterns for additional jobs. The table shows growth in the resident labour supply of between 12,100 and 12,700 people.

Figure 3.22: Forecast job growth and change in resident workforce (2022-41)			
	Total additional jobs	Allowance for double jobbing (=change in economically active)	Allowance for commuting
Census commuting	12,418	12,145	12,704
1:1 commuting	12,418	12,145	12,145

Source: Derived from a range of sources

- 3.70 Drawing through the modelling assumptions set out upfront, the table below shows estimates of housing need set against the job growth scenarios. The analysis shows a range of need across the City Council area of between 647 and 666 dwellings per annum – these figures are below the Standard Method (955 per annum).

Figure 3.23: Economic-led Housing Need – Chelmsford					
	Households 2022	Households 2041	Change in households	Per annum	Dwellings (per annum)
Census commuting	76,076	88,369	12,294	647	666
1:1 commuting	76,062	88,004	11,942	629	647

Source: Demographic projections

Overall Housing Need: Key Messages

- The SHNA studied the overall housing need set against the NPPF and the framework of PPG – specifically the Standard Method for assessing housing need. This shows a need for 955 dwellings per annum. This is based on household growth of 631 per annum and an uplift for affordability of 51%.
- The report has considered whether there are exceptional circumstances to move away from the Standard Method (either in an upward or downward direction). This looked at up-to-date demographic trends and is also mindful of the NPPF consultation of December 2022 which points to there being some strengthening of the encouragement for local authorities to consider exceptional circumstances. The consultation NPPF suggests that consideration will be given to 2021-based projections when these are published in 2024.
- The report looks at more recent demographic trends – taking account of 2021 Census data and ONS mid-year population estimates up to 2021, this data was compared with the 2014-based projections. Whilst there were differences between sources, these were not considered to be substantial and did not point to any exceptional circumstances.
- Data about household growth from the Census also showed a similar pattern to that in the 2014-based projections, again pointing to the projections underpinning the Standard Method as remaining reasonable.
- Past build rates were also considered as areas with strong growth might be able to provide more homes than the Standard Method (also high delivery might point to an over-supply of housing). In Chelmsford, whilst delivery has been strong, averaging approaching 814-958 dwellings per annum over the past 5- and 10-years) it is again not considered that this provides any evidence to suggest a higher or lower figure than the Standard Method.
- As a final test on exceptional circumstances, the Standard Method projection was used to look at potential changes to the resident labour supply and the number of additional jobs that might be supported. Overall, it was projected the labour supply would increase by around 21% over the 2022-41 period and that this could support around 21,000 additional jobs – this is above an economic forecast (just over 12,400 jobs for the same period) and again points to there being no need to plan for housing in addition to the Standard Method.
- Overall, it was therefore concluded that the Standard Method is a reasonable assessment of housing need for Chelmsford (noting the premise of the method itself has not been challenged in this report). On that basis a bespoke demographic projection was developed to look at how the population might change if 955 homes per annum were delivered over the 2022-41 period. This showed continued strong population growth and an ageing of the population, although an increase in the number of children and those of ‘working-age’ is also projected.

4. Affordable Housing Need

Introduction

- 4.1 This section provides an assessment of the need for affordable housing in Chelmsford and the three sub-areas. The analysis specifically considers general needs housing, with further analysis of specialist housing (e.g. for older people) being discussed later in the report.
- 4.2 The analysis follows the PPG (Sections 2a-018 to 2a-024) and provides two main outputs, linked to Annex 2 of the NPPF – this is firstly an assessment of the need from households unable to buy OR rent housing and secondly from households able to rent but not buy. For convenience these analyses are labelled as a need for ‘social/affordable rented housing’ and ‘affordable home ownership’ although in reality it is possible for an affordable home ownership product to fit into the rented category (as long as the price is sufficiently low) or for a rented product (such as rent-to-buy) to be considered as affordable home ownership.
- 4.3 The analysis also considers First Homes, which looks likely to become a new tenure (potentially replacing other forms of affordable home ownership). Further information about First Homes was set out in a Planning Practice Guidance in May 2021.

Methodology Overview

- 4.4 The method for studying the need for affordable housing has been enshrined in Government practice guidance for many years, with an established approach to look at the number of households who are unable to afford market housing (to either rent or buy) – it is considered that this group will mainly be a target for rented affordable homes (social/affordable rented) and therefore the analysis looks a need for ‘*affordable housing for rent*’ as set out in Annex 2 of the NPPF. The methodology for looking at the need for rented (social/affordable) housing considers the following:
- **Current affordable housing need:** an estimate of the number of households who have a need now, at the point of the assessment, based on a range of secondary data sources – this figure is then annualised so as to meet the current need over a period of time;
 - **Projected newly forming households in need:** using demographic projections to establish gross household formation, and then applying an affordability test to estimate numbers of such households unable to afford market housing;
 - **Existing households falling into need:** based on studying past trends in the types of households who have accessed social/affordable rented housing; and
 - **Supply of affordable housing:** an estimate of the likely number of lettings that will become available from the existing social/affordable housing stock.
- 4.5 The first three bullet points above are added together to identify a gross need, from which the supply of relets of existing properties is subtracted to identify a net annual need for additional affordable housing. For the purposes of this assessment, this analysis is used to identify the overall (net) need for social/affordable rented housing.

- 4.6 This approach has traditionally been used to consider the needs of households who have not been able to afford market housing (either to buy or to rent). As the income necessary to afford to rent homes without financial support is typically lower than that needed to buy, the ability of households to afford private rents has influenced whether or not they are in need of affordable housing.
- 4.7 The NPPF and associated guidance has expanded the definition of those in affordable housing need to include households who might be able to rent without financial support but who aspire to own a home, and require support to do so. The PPG includes households that “*cannot afford their own homes, either to rent, or to own, where that is their aspiration*” as having an affordable housing need.
- 4.8 This widened definition has been introduced by national Government to support increased access to home ownership, given evidence of declining home ownership and growth in private renting over the last 20 years or so. The PPG does not however provide specific guidance on how the needs of such households should be assessed and so this study adopts a broadly consistent methodology to that identified in the PPG, and consider a current need; a newly-arising need on an annual basis; existing households falling into need; and an annual estimate of supply.
- 4.9 The analysis of affordable housing need is therefore structured to consider the need for rented affordable housing, and separately the need for affordable home ownership. The overall need is expressed as an annual figure, which can then be compared with likely future delivery (as required by 2a-024).
- 4.10 Whilst the need for social/affordable rented housing and affordable home ownership are analysed separately, there are a number of pieces of information that are common to both assessments. In particular, this includes an understanding of local housing costs, incomes and affordability. The sections below therefore look at these factors.

Local Prices and Rents

- 4.11 An important part of the affordable needs model is to establish the entry-level costs of housing to buy and rent. The affordable housing needs assessment compares prices and rents with the incomes of households to establish what proportion of households can meet their needs in the market, and what proportion require support and are thus defined as having an ‘affordable housing need’. For the purposes of establishing affordable housing need, the analysis focuses on overall housing costs (for all dwelling types and sizes).
- 4.12 The analysis below considers the entry-level costs of housing to both buy and rent across the City Council area. The approach has been to analyse Land Registry and ONS data to establish lower quartile prices and rents. Using a lower quartile figure is consistent with the PPG and reflects the entry-level point into the market recognising that the very cheapest properties may be of sub-standard quality.

- 4.13 Data from the Land Registry for the year to September 2022 shows estimated lower quartile property prices by dwelling type. The data shows that entry-level costs to buy are estimated to start from about £180,000 for a second-hand flat and rising to £490,000 for a detached home. Looking at the lower quartile price across all dwelling types, the analysis shows a lower quartile price of £290,000. The figures are all based on cost of existing homes in the market although newbuild prices are considered later in this section when looking at potential costs of affordable home ownership properties.

Figure 4.1: Estimated lower quartile cost of housing to buy by type (existing dwellings) – year to September 2022 – Chelmsford	
	Lower quartile price
Flat/maisonette	£180,000
Terraced	£315,000
Semi-detached	£365,000
Detached	£490,500
All dwellings	£290,000

Source: Land Registry

- 4.14 It is also useful to provide estimates of property prices by the number of bedrooms in a home. Analysis for this draws together Land Registry data with an internet search of prices of homes for sale (using sites such as Rightmove). The analysis suggests a lower quartile price of about £180,000 for a 1-bedroom home, rising to £525,000 for homes with 4-bedrooms.

Figure 4.2: Estimated lower quartile cost of housing to buy by size (existing dwellings) – year to September 2022 – Chelmsford	
	Lower quartile price
1-bedroom	£180,000
2-bedrooms	£240,000
3-bedrooms	£375,000
4-bedrooms	£525,000
All Dwellings	£290,000

Source: Land Registry and Internet Price Search

- 4.15 A similar analysis has been carried out for private rents using ONS data – this covers a 12-month period to September 2022. For the rental data, information about dwelling sizes is provided (rather than types); the analysis shows an average lower quartile cost (across all dwelling sizes) of £834 per month.

	Lower Quartile rent, pcm
Room only	£465
Studio	£550
1-bedroom	£750
2-bedrooms	£895
3-bedrooms	£1,100
4-bedrooms	£1,425
All properties	£850

Source: ONS

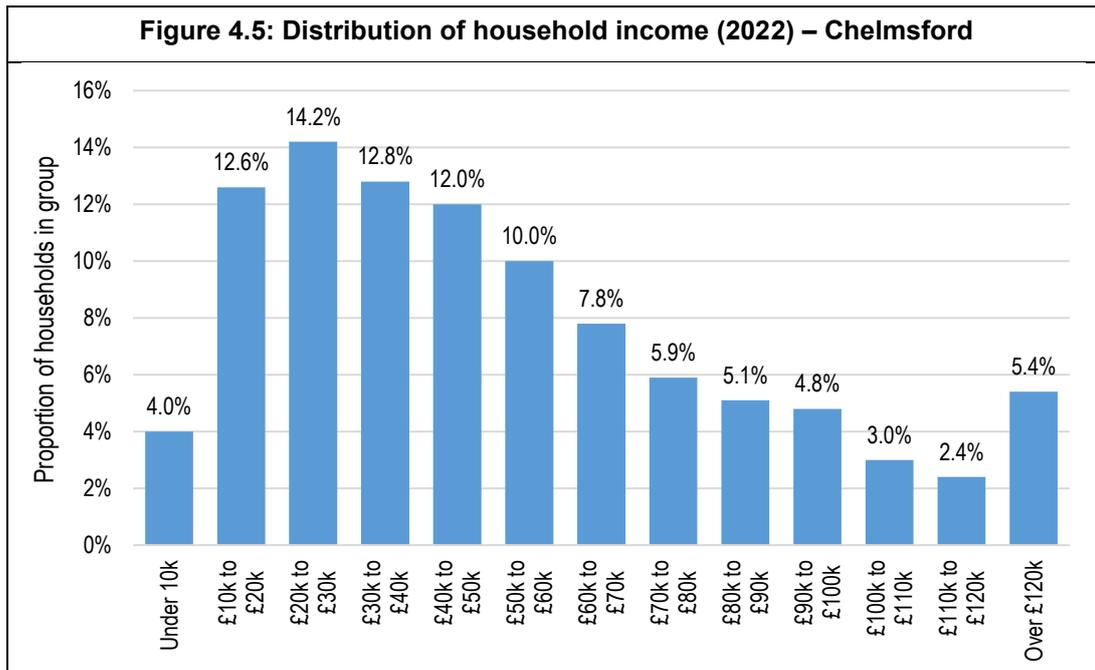
- 4.16 It is of interest for this study to see how prices and rents vary by location. The table below shows an estimate of the overall lower quartile house price and private rent in each of the sub-areas; this is based on Land Registry data for prices and analysis of online data on available lettings which has then been adjusted to be consistent with the data from ONS. The analysis shows some variation in prices and rents, with prices (and rents) estimated to be highest in Rural areas. The lowest prices and rents were found to be in South Woodham Ferrers.

	Lower quartile price (existing dwellings)	Lower Quartile rent, pcm
Urban	£263,000	£790
Rural	£360,000	£1,070
South Woodham Ferrers	£262,000	£710
All properties	£290,000	£850

Source: Internet private rental cost search and Land Registry

Household Incomes

- 4.17 Following on from the assessment of local prices and rents it is important to understand local income levels as these (along with the price/rent data) will determine levels of affordability (i.e. the ability of a household to afford to buy or rent housing in the market without the need for some sort of subsidy). Data about total household income has been based on ONS modelled income estimates, with additional data from the English Housing Survey (EHS) being used to provide information about the distribution of incomes.
- 4.18 Drawing this data together an income distribution for the whole City Council area has been constructed for 2022. The figure below shows that around a third of households have incomes below £30,000 with a further quarter in the range of £30,000 to £50,000. Overall, the average (mean) income is estimated to be around £53,200, with a median income of £44,900; the lower quartile income of all households is estimated to be £25,800.



Source: Derived from a range of data

- 4.19 Analysis has also been undertaken to estimate how incomes vary by sub-area, with the table below showing the estimated median household income in each location, the table also shows the variance in incomes from the City Council area average. There is some variation in the estimated incomes by area, median figures ranging from £43,300 in the Urban area, up to £47,500 in Rural locations.

Figure 4.6: Estimated average (median) household income by sub-area (2022)

	Median income	As a % of City Council area average
Urban	£43,300	96%
Rural	£47,500	106%
South Woodham Ferrers	£46,800	104%
All households	£44,900	-

Source: Derived from a range of data

Affordability Thresholds

- 4.20 To assess affordability two different measures are used; firstly to consider what income levels are likely to be needed to access private rented housing (this establishes those households in need of social/affordable rented housing) and secondly to consider what income level is needed to access owner occupation (this, along with the first test helps to identify households in the 'gap' between renting and buying). This analysis therefore brings together the data on household incomes with the estimated incomes required to access private sector housing. Additionally, different affordability tests are applied to different parts of the analysis depending on the group being studied (e.g. recognising that newly forming households are likely on average to have lower incomes than existing households).

- 4.21 A household is considered able to afford market rented housing in cases where the rent payable would constitute no more than a particular percentage of gross income. The choice of an appropriate threshold is an important aspect of the analysis – the PPG does not provide any guidance on this issue. CLG SHMA guidance prepared in 2007 suggested that 25% of income is a reasonable start point, it also noted that a different figure could be used. Analysis of current letting practice suggests that letting agents typically work on a multiple of 40%. Government policy (through Housing Benefit payment thresholds) would also suggest a figure of 40%+ (depending on household characteristics).
- 4.22 At £850 per calendar month, lower quartile rent levels in Chelmsford are above average in comparison to those seen nationally (a lower quartile rent of £610 for England in the year to September 2022). This would suggest that a proportion of income to be spent on housing could be higher than the bottom end of the range (the range starting from 25%). On balance, it is considered that a threshold of 30% is reasonable in a local context, to afford an £850 pcm rent would imply a gross household income of about £34,000 (and in net terms the rent would likely be around 37% of income).
- 4.23 In reality, many households may well spend a higher proportion of their income on housing and therefore would have less money for other living costs – for the purposes of this assessment these households would essentially be assumed as ideally having some form of subsidised rent so as to ensure a sufficient level of residual income.
- 4.24 Generally, the income required to access owner-occupied housing is higher than that required to rent and so the analysis of the need for social/affordable rented housing is based on the ability to afford to access private rented housing. However, local house prices (and affordability) are important when looking at the need for affordable home ownership.
- 4.25 For the purposes of this assessment, the income thresholds for owner-occupation assume a household has a 10% deposit and can secure a mortgage for four and a half times their salary. These assumptions are considered to be broadly in line with typical lending practices although it is recognised that there will be differences on a case by case basis.
- 4.26 The table below shows the estimated incomes required to both buy and rent (privately) in each sub-area. This shows a notable ‘gap’ in all areas across the City Council area, particularly locations with higher house prices. The information in the tables below is taken forward into further analysis in this section to look at affordable needs in different locations.

Figure 4.7: Estimated Household Income Required to Buy and Privately Rent by sub-area			
	To buy	To rent (privately)	Income gap
Urban	£52,600	£31,600	£21,000
Rural	£72,000	£42,800	£29,200
South Woodham Ferrers	£52,400	£28,400	£24,000
City Council area-wide	£58,000	£34,000	£24,000

Source: Based on Housing Market Cost Analysis

Need for Social/Affordable Rented Housing

4.27 The sections below work through the various stages of analysis to estimate the need for social/affordable housing in the City Council area and sub-areas. Final figures are provided as an annual need (including an allowance to deal with current need). As per 2a-024 of the PPG, this figure can then be compared with likely delivery of affordable housing.

Current Need

4.28 In line with the PPG the current need for affordable housing is assessed through analysis of Housing Register information. As part of this project a download of the whole register was provided (as of October 2022) which has been interrogated to estimate the number of households with an affordable housing need – as of October 2022 there were 902 households on the Register.

4.29 The table below shows the locations (based on correspondence address postcode) of those in need. The majority of households live in the Urban part of the authority with a lower proportion being in South Woodham Ferrers. Some 146 households are shown in the table below as unknown/out-of-area; these households will have been verified and assessed as being in housing need.

	Number of households	% of households
Urban	566	62.7%
Rural	153	17.0%
South Woodham Ferrers	37	4.1%
Unknown/out-of-area	146	16.2%
TOTAL	902	100.0%

Source: Chelmsford Council

4.30 As well as looking at the level of need of households on the register, it is important to understand the living circumstances of those households. In particular, this focusses on current tenure, recognising that households already living in affordable housing would release a home for use by another household if they were to move and hence there is no additional need for housing to be provided (although there may be a mismatch between the homes needed and those released, both in terms of size and location). The table below shows around 244 households are currently living in affordable housing leaving 566 within private sector housing or without accommodation (e.g. concealed households). There are a further 6 households for whom tenure data was not available, these have been excluded from further analysis. Where location data was unknown, the modelling includes additional households on a pro-rata basis, depending on the numbers in need in each sub-area (shown as the final row in the table below).

4.31 Given that this report typically looks at needs in the period from 2022 to 2041, the need (566 households) is annualised by dividing by 19 (to give an annual need for around 30 dwellings across all areas). This does not mean that some households would be expected to wait 19-years for housing as the need is likely to be dynamic, with households leaving the current need as they are housed but with other households developing a need over time.

Figure 4.9: Current tenure of households on Housing Register by sub-area

	Urban	Rural	South Woodham Ferrers	Unknown/out-of-area	TOTAL
LA/RP housing	184	73	6	63	326
No housing (e.g. concealed/homeless)	150	37	13	44	244
Private sector	227	42	18	35	322
Unknown	5	1	0	4	10
TOTAL	566	153	37	146	902
In need for modelling	377	79	31	79	566
Including Unknown	438	92	36	-	566

Source: Chelmsford Council

Newly-Forming Households

- 4.32 The number of newly forming households has been estimated through demographic modelling with an affordability test also being applied. This has been undertaken by considering the changes in households in specific 5-year age bands relative to numbers in the age band below, 5 years previously, to provide an estimate of gross household formation.
- 4.33 The number of newly-forming households is limited to households forming who are aged under 45 – this is consistent with CLG guidance (from 2007) which notes after age 45 that headship (household formation) rates ‘plateau’. There may be a small number of household formations beyond age 45 (e.g. due to relationship breakdown) although the number is expected to be fairly small when compared with formation of younger households.
- 4.34 The number of newly forming households has been estimated through demographic modelling (linked to the main trend-based projection set out in the previous section). This is considered to provide the best view about household formation in Chelmsford.
- 4.35 In assessing the ability of newly forming households to afford market housing, data has been drawn from previous surveys undertaken nationally by JGC. This establishes that the average income of newly forming households is around 84% of the figure for all households. This figure is remarkably consistent across areas (and is also consistent with analysis of English Housing Survey data at a national level).
- 4.36 The analysis has therefore adjusted the overall household income data to reflect the lower average income for newly forming households. The adjustments have been made by changing the distribution of income by bands such that average income level is 84% of the all household average. In doing this it is possible to calculate the proportion of households unable to afford market housing. For the purposes of the need for social/affordable rented housing this will relate to households unable to afford to buy OR rent in the market.
- 4.37 The assessment suggests overall that around 45% of newly forming households will be unable to afford market housing (to rent privately) and this equates a total of 685 newly forming households will have a need per annum on average across the City Council area – the table below provides a breakdown by sub-area.

Figure 4.10: Estimated Need for Social/Affordable Rented Housing from Newly Forming Households (per annum)			
	Number of new households	% unable to afford	Annual newly forming households unable to afford to rent
Urban	979	42.4%	415
Rural	422	53.6%	226
South Woodham Ferrers	130	33.9%	44
TOTAL	1,530	44.8%	685

Source: Projection Modelling/Affordability Analysis

Existing Households Falling into Affordable Housing Need

- 4.38 The second element of newly arising need is existing households falling into need. To assess this, information about past lettings in social/affordable rented has been used. The assessment looked at households who have been housed in general needs housing over the past three years – this group will represent the flow of households onto the Housing Register over this period. From this, newly forming households (e.g. those currently living with family) have been discounted as well as households who have transferred from another social/affordable rented property. An affordability test has also been applied.
- 4.39 This method for assessing existing households falling into need is consistent with the 2007 SHMA guide which says on page 46 that '*Partnerships should estimate the number of existing households falling into need each year by looking at recent trends. This should include households who have entered the housing register and been housed within the year as well as households housed outside of the register (such as priority homeless household applicants)*'. Following the analysis through suggests a need arising from 142 existing households each year across the City Council area. The table below breaks this down by sub-area.

Figure 4.11: Estimated Need for Social/Affordable Rented Housing from Existing Households Falling into Need (per annum)		
	Total Additional Need	% of Total
Urban	100	70.3%
Rural	31	22.0%
South Woodham Ferrers	11	7.7%
TOTAL	142	100.0%

Source: Derived from a range of sources

Supply of Social/Affordable Rented Housing Through Relets

- 4.40 The future supply of affordable housing through relets is the flow of affordable housing arising from the existing stock that is available to meet future need. This focusses on the annual supply of social/affordable rent relets.

- 4.41 The Practice Guidance suggests that the estimate of likely future relets from the social rented stock should be based on past trend data which can be taken as a prediction for the future. Information from CoRe has been used to establish past patterns of social housing turnover. The figures are for general needs lettings but exclude lettings of new properties and also exclude an estimate of the number of transfers from other social rented homes. These exclusions are made to ensure that the figures presented reflect relets from the existing stock.
- 4.42 On the basis of past trend data it has been estimated that 234 units of social/affordable rented housing are likely to become available each year moving forward for occupation by households in need. It should be noted from the table (and confirmed by the Council) that relets have been falling over time and a continuation of this trend would mean a lower level of supply in the future than has been assumed in this assessment (which in turn would increase estimates of the need for additional affordable housing).

Figure 4.12: Analysis of Past Social/Affordable Rented Housing Supply, 2019/20 – 2021/22 (average per annum) – Chelmsford

	Total Lettings	% as Non-New Build	Lettings in Existing Stock	% Non-Transfers	Lettings to New Tenants
2019/20	549	83.2%	457	63.0%	288
2020/21	426	71.8%	306	69.5%	213
2021/22	402	77.9%	313	64.2%	201
Average	459	78.1%	359	65.4%	234

Source: CoRe

- 4.43 The table below shows the estimated supply of affordable housing from relets in each sub-area. The sub-area figures have been based on the size of the stock in each sub-area as of 2021 (Census data).

Figure 4.13: Estimated supply of affordable housing from relets of existing stock by sub-area (per annum)

	Annual supply	% of supply
Urban	156	66.4%
Rural	70	30.0%
South Woodham Ferrers	8	3.6%
TOTAL	234	100.0%

Source: CoRe/Census (2021)

- 4.44 The PPG model also includes the bringing back of vacant homes into use and the pipeline of affordable housing as part of the supply calculation. These have however not been included within the modelling in this report. Firstly, there is no evidence of any substantial stock of vacant homes (over and above a level that might be expected to allow movement in the stock). Secondly, with the pipeline supply, it is not considered appropriate to include this as to net off new housing would be to fail to show the full extent of the need, although in monitoring it will be important to net off these dwellings as they are completed.

Net Need for Social/Affordable Housing

- 4.45 The table below shows the overall calculation of affordable housing need. The analysis shows that there is a need for 623 dwellings per annum across the City Council area – an affordable need is seen in all sub-areas. The net need is calculated as follows:

$$\text{Net Need} = \text{Current Need (allowance for)} + \text{Need from Newly-Forming Households} + \text{Existing Households falling into Need} - \text{Supply of Affordable Housing}$$

Figure 4.14: Estimated Need for Social/Affordable Rented Housing by sub-area (per annum)

	Current need	Newly forming households	Existing households falling into need	Total Gross Need	Relet Supply	Net Need
Urban	23	415	100	538	156	382
Rural	5	226	31	262	70	192
South Woodham Ferrers	2	44	11	57	8	48
TOTAL	30	685	142	857	234	623

Source: Derived from a range of sources

- 4.46 Whilst the need above is provided down to sub-area level, it should be remembered that affordable need can be met across the City Council area as and when opportunities arise, and so specific sub-area data should not be treated as a local target.

The Relationship Between Affordable Need and Overall Housing Numbers

- 4.47 The PPG encourages local authorities to consider increasing planned housing numbers where this can help to meet the identified affordable need. Specifically, the wording of the PPG [2a-024] states:

'The total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. An increase in the total housing figures included in the strategic plan may need to be considered where it could help deliver the required number of affordable homes'

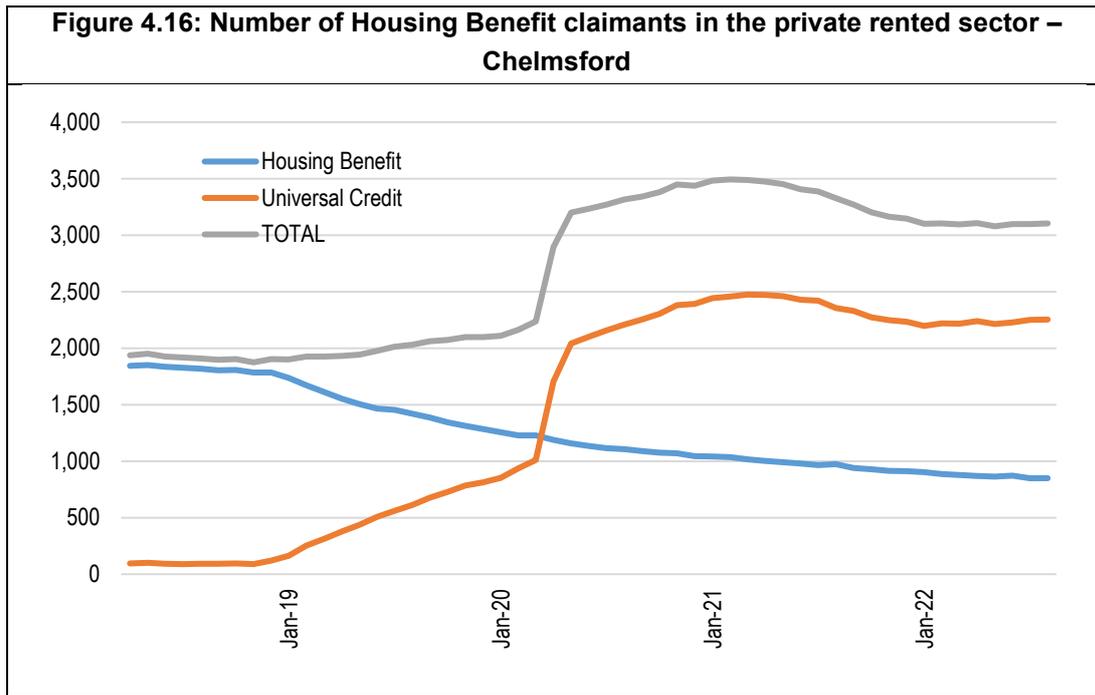
- 4.48 However, the relationship between affordable housing need and overall housing need is complex. This was recognised in the Planning Advisory Service (PAS) Technical Advice Note of July 2015. PAS conclude that there is no arithmetical way of combining the OAN (calculated through demographic projections) and the affordable need. There are a number of reasons why the two cannot be 'arithmetically' linked.
- 4.49 Firstly, the modelling contains a category in the projection of '*existing households falling into need*'; these households already have accommodation and hence if they were to move to alternative accommodation, they would release a dwelling for use by another household – there is no net need to provide additional homes. The modelling also contains '*newly forming households*'; these households are a direct output from the demographic modelling and are therefore already included in the overall housing need figures.

- 4.50 This just leaves the ‘*current need*’; much of this group will be similar to the existing households already described (in that they are already living in accommodation) although it is possible that a number will be households without housing (mainly concealed households) – these households are not included in the demographic modelling and so are arguably an additional need, although uplifts for market signals/affordability (as included in the Government’s Standard Method) would be expected to deal with such households.
- 4.51 The analysis estimates an annual need for 623 rented affordable homes, which is notionally 65% of a Local Housing Need of 955 dwellings per annum (as calculated using the Standard Method). However, as noted, caution should be exercised in trying to make a direct link between affordable need and planned delivery, with the key point being that many of those households picked up as having a need will already be living in housing and so providing an affordable option does not lead to an overall net increase in the need for housing (as they would vacate a home to be used by someone else) – although there can still be a mismatch between homes needed and those available (e.g. by size).
- 4.52 It is possible to investigate this in some more detail by re-running the model and excluding those already living in accommodation. This is shown in the table below which identifies that meeting these needs would lead to an affordable need for 463 homes per annum across the City Council area – notionally 48% of the Standard Method. This figure is theoretical and should not be seen to be minimising the need (which is clearly acute). It does however serve to show that there is a substantial difference in the figures when looking at overall housing shortages.
- 4.53 The analysis is arguably even more complex than this – it can be observed that the main group of households in need are newly forming households. These households are already included within demographic projections and so the demonstrating of a need for this group again should not be seen as over and above any need derived through the normal process of looking at need. Indeed, only the 12 per annum (current need) is in addition to demographic projections and this scale of uplift will already have been included in figures when moving from a demographic start point to an estimate of housing need using the Standard Method.

Figure 4.15: Estimated Need for Affordable Housing (social/affordable rented) excluding households already in accommodation – Chelmsford		
	Including existing households	Excluding existing households
Current need	30	12
Newly forming households	685	685
Existing households falling into need	142	0
Total Gross Need	857	697
Re-let Supply	234	234
Net Need	623	463

Source: Derived from a range of sources

- 4.54 Additionally, it should be noted that the need estimate is on a per annum basis and should not be multiplied by the plan period to get a total need. Essentially, the estimates are for the number of households who would be expected to have a need in any given year (i.e. needing to spend more than 30% of income on housing). In reality, some (possibly many) households would see their circumstances change over time such that they would 'fall out of need' and this is not accounted for in the analysis. One example would be a newly forming household with an income level that means they spend more than 30% of income on housing, as the household's income rises they would potentially pass the affordability test and therefore not have an affordable need. Additionally, there is the likelihood when looking over the longer-term that a newly-forming household will become an existing household in need and would be counted twice if trying to multiply the figures out for a whole plan period.
- 4.55 The discussion above has already noted that the need for affordable housing does not generally lead to a need to increase overall provision (with the exception of potentially providing housing for concealed households although this should be picked up as part of an affordability uplift). It is however worth briefly thinking about how affordable need works in practice and the housing available to those unable to access market housing without Housing Benefit. In particular, the role played by the Private Rented Sector (PRS) in providing housing for households who require financial support in meeting their housing needs should be recognised.
- 4.56 Whilst the Private Rented Sector (PRS) does not fall within the types of affordable housing set out in the NPPF (other than affordable private rent which is a specific tenure separate from the main 'full market' PRS), it has evidently been playing a role in meeting the needs of households who require financial support in meeting their housing need. Government recognises this, and indeed legislated through the 2011 Localism Act to allow Councils to discharge their "homelessness duty" through providing an offer of a suitable property in the PRS.
- 4.57 It is also worth reflecting on the NPPF (Annex 2) definition of affordable housing. This says: *'Affordable housing: housing for sale or rent, for those whose needs are not met by the market'* [emphasis added]. Clearly where a household is able to access suitable housing in the private rented sector (with or without Housing Benefit) it is the case that these needs are being met by the market (as within the NPPF definition). As such the role played by the private rented sector should be recognised – it is evidently part of the functioning housing market.
- 4.58 Data from the Department of Work and Pensions (DWP) has been used to look at the number of Housing Benefit supported private rented homes. As of August 2022, it is estimated that there were around 3,100 benefit claimants in the private rented sector in Chelmsford. From this, it is clear that the PRS contributes to the wider delivery of 'affordable homes' with the support of benefit claims, and further complicates any attempts to find a relationship between affordable need and overall housing need.
- 4.59 The figure below shows the trend in the number of claimants in the City Council area. This shows there has been a notable increase since March 2020, which is likely to be related to the Covid-19 pandemic. However, even the more historical data shows a substantial number of households claiming benefit support for their housing in the private sector (typically around 2,000 households).



Source: Department of Work and Pensions

- 4.60 Whilst housing delivery through the Local Plan can be expected to secure additional affordable housing it needs to be noted that delivery of affordable housing through planning obligations is an important, but not the only means, of delivery affordable housing; and the Council should also work with housing providers to secure funding to support enhanced affordable housing delivery on some sites and through use of its own land assets.
- 4.61 Overall, it is difficult to link the need for affordable housing to the overall housing need; indeed, there is no justification for trying to make the link. Put simply the two do not measure the same thing and interpreting the affordable need figure consideration needs to be given to the fact that many households already live in housing, and do not therefore generate an overall net need for an additional home. Further issues arise as the need for affordable housing is complex and additionally the extent of concealed and homeless households needs to be understood as well as the role played by the private rented sector.
- 4.62 Regardless of the discussion above, the analysis identifies a notable need for affordable housing, and it is clear that provision of new affordable housing is an important and pressing issue across the City Council area. It does however need to be stressed that this report does not provide an affordable housing target; the amount of affordable housing delivered will be limited to the amount that can viably be provided. As noted previously, the evidence does however suggest that affordable housing delivery should be maximised where opportunities arise.
- 4.63 Finally, whilst there is no direct link between the affordable need and overall housing need, it is the case that the levels of affordable need across areas can feed into considerations about the distribution of housing for different areas, along with an understanding of demographic trends and economic growth.

Split Between Social and Affordable Rented Housing

- 4.64 The analysis above has studied the overall need for social and affordable rented housing with a focus on households who cannot afford to rent in the market. These households will therefore have a need for some form of rented housing at a cost below typical market rates. Typically, there are two main types of rented affordable accommodation (social and affordable rented) with the analysis below initially considering what a reasonable split might be between these two tenures.
- 4.65 The table below shows current rent levels in the City Council area for a range of products along with relevant local housing allowance (LHA) rates. The majority of Chelmsford falls into the Chelmsford Broad Rental Market Area (BRMA) for the purposes of LHA, with a small area being part of the South West Essex BRMA.
- 4.66 Data about average social and affordable rents has been taken from the Regulator of Social Housing (RSH) and this is compared with lower quartile and median market rents (from ONS data). This analysis shows that social rents are lower than affordable rents; the analysis also shows that affordable rents are notably lower than both lower quartile and median market rents.
- 4.67 The LHA rates for all sizes of home are lower than lower quartile market rents and notably below median figures. This does potentially mean that households seeking accommodation in many locations (notably those areas with higher rents) may struggle in some cases to secure sufficient benefits to cover their rent.

	Social rent	Affordable rent (AR)	Lower quartile (LQ) market rent	Median market rent	LHA (Chelmsford)
1-bedroom	£396	£560	£750	£850	£648
2-bedrooms	£452	£678	£895	£1,000	£793
3-bedrooms	£509	£813	£1,100	£1,250	£982
4-bedrooms	£611	£912	£1,425	£1,695	£1,291
All	£452	£668	£850	£995	-

Source: RSH, ONS and VOA

- 4.68 To some extent it is easier to consider the data above in terms of the percentage one housing cost is of another and this is shown in the table below. Caution should be exercised when looking at the overall averages as these will be influenced by the profile of stock in each category and so the discussion focusses on 2-bedroom homes (this is the main stock size held by Affordable Housing Providers, 31% of social rented housing and 51% of affordable rents). This shows that social rents are significantly cheaper than market rents (and indeed affordable rents) but that affordable rents (as currently charged) represent 76% of a current lower quartile rent (68% if comparing with a median rent).

Figure 4.18: Difference between rent levels for different products – Chelmsford

	Social rent as % of affordable rent	Social rent as % of LQ market rent	Social rent as % of median market rent	Affordable rent as % of LQ market rent	Affordable rent as % of median market rent	LQ market rent as % of median market rent
1-bedroom	71%	53%	47%	75%	66%	88%
2-bedrooms	67%	51%	45%	76%	68%	90%
3-bedrooms	63%	46%	41%	74%	65%	88%
4-bedrooms	67%	43%	36%	64%	54%	84%
All	68%	53%	45%	79%	67%	85%

Source: RSH, ONS and VOA

- 4.69 For the affordability test, a standardised average rent for each product has been used based on the proportion of stock in each size category. The table below suggests that around 29% of households who cannot afford to rent privately could afford an affordable rent, with a further 34% being able to afford a social rent (but not an affordable one). A total of 37% of households would need some degree of benefit support to be able to afford their housing (regardless of the tenure).
- 4.70 Essentially this table is saying that 29% of households have an income in the gap between affording a private rent and an affordable rent (which is typically around 75% of a market rent); 34% of households have an income which would enable affording a social rent without the need for benefit but not afford an affordable rent. The final 37% have incomes at the very bottom end of the distribution and would need to claim benefit to pay rent even on the cheapest properties (social rented homes).

Figure 4.19: Estimated need for affordable rented housing (% of households able to afford)

	% of households able to afford
Afford affordable rent	29%
Afford social rent	34%
Need benefit support	37%
All unable to afford market	100%

Source: Affordability analysis

- 4.71 The finding that only 29% of households can afford an affordable rent does not automatically lead to a policy conclusion on the split between the two types of housing. For example, many households who will need to access rented accommodation will be benefit dependent and as such could technically afford an affordable rent – hence a higher proportion of affordable rented housing might be appropriate – indeed the analysis does identify a substantial proportion of households as being likely to need benefit support. On the flip side, providing more social rents might enable households to return to work more easily, as a lower income would potentially be needed to afford the lower social (rather than affordable) rent.

- 4.72 There will be a series of other considerations both at a strategic level and for specific schemes. For example, there may be funding streams that are only available for a particular type of housing, and this may exist independently to any local assessment of need. Additionally, there will be the consideration of the balance between the cost of housing and the amount that can be viably provided, for example, it is likely that affordable rented housing is more viable, and therefore a greater number of units could be provided. Finally, in considering a split between social and affordable rented housing it needs to be considered that having different tenures on the same site (at least at initial occupation) may be difficult – e.g. if tenants are paying a different rent for essentially the same size/type of property and services.
- 4.73 On this basis, it is not recommended that the Council has a rigid policy for the split between social and affordable rented housing, although the analysis is clear that both tenures of homes (and particularly socially rented housing) are likely to be required.

Temporary Accommodation

- 4.74 In looking at the need for different types of rented affordable housing, it is considered that trends in the number of people in temporary accommodation is also relevant – this is because such households are likely to have very low incomes/be fully benefit dependent and would therefore need a social rented solution were one to be available.
- 4.75 In Chelmsford, the number of households in temporary accommodation has been rising rapidly, from 69 households in 2012/13 to 360 by December 2022 – a 500% rise over the past decade. Whilst this section does not consider the size mix of affordable housing (see section on housing mix) it is also the case that a large proportion of those in temporary accommodation need larger homes (32% needing a 3+-bedroom home as of December 2022). The table below shows the number in temporary accommodation and the number/proportion needing a larger home.

Figure 4.20: Number of households in temporary accommodation (TA) - Chelmsford

Year	Nos. in TA	Needing 3-bed	Needing 4-bed+	% needing 3+-bedrooms
2012/13	69	-	-	-
2013/14	117	-	-	-
2014/15	153	-	-	-
2015/16	249	-	-	-
2016/17	343	-	-	-
2017/18	319	-	-	-
2018/19	275	-	-	-
2019/20	270	55	20	28%
2020/21	254	51	31	32%
2021/22	307	61	31	30%
Dec 2022	360	64	50	32%

Source: Chelmsford Council

- 4.76 As numbers increase, so too does the waiting time and therefore a growing backlog of families in TA. The lack of 4-beds is having an impact on those overcrowded in smaller social homes being unable to transfer and release their homes, hence an ongoing reduction in supply from the existing stock.

- 4.77 Another significant change has been the number of single people/1-bed need in temporary accommodation since the pandemic – the number of households needing a 1-bedroom home and being in TA rising from 52 in March 2020, up to 149 by December 2022.
- 4.78 Most homeless families will be in priority need (and owed a duty to be accommodated) because of children. For single people priority need is not so self-evident and will usually be as result of either fleeing domestic abuse or more likely mental health. Physical disability and other reasons are less common.
- 4.79 The lack of suitable supported housing means that for a growing number including those with complex needs, temporary accommodation with move-on into conventional social housing with low-level or no support is the most common option. This can lead to cyclical homelessness.
- 4.80 The most common support needs of those presenting as homeless to Chelmsford in mental health – 404 cases in 2021/22 however the Council has no direct access to accommodation with support although some households may be receiving help from existing services such as NHS and primary care.
- 4.81 Overall, the data on temporary accommodation clearly points to an increasing problem, and one which suggests a need for social housing where possible, due to lower costs. There are also issues surrounding care needs; whilst this is outside any assessment of the physical need for dwellings, it does still point to a need for social housing for these groups – as they are likely to have very low incomes and be benefit dependent.
- 4.82 Therefore whilst the initial conclusion above is not to have a rigid split between social and affordable rents, there is a clear need for a (probably significant) proportion of homes to be at social rents.

Establishing a Need for Affordable Home Ownership

- 4.83 The Planning Practice Guidance confirms a widening definition of those to be considered as in affordable need; now including *‘households which can afford to rent in the private rental market, but cannot afford to buy despite a preference for owning their own home’*. However, at the time of writing, there is no guidance about how the number of such households should be measured.
- 4.84 The methodology used in this report therefore draws on the current methodology, and includes an assessment of current needs, and projected need (newly forming and existing households). The key difference is that in looking at affordability an estimate of the number of households in the ‘gap’ between buying and renting is used. There is also the issue of establishing an estimate of the supply of affordable home ownership homes – this is considered separately below.
- 4.85 The analysis has been developed in the context of First Homes with the Government proposing that 25% of all affordable housing secured through developer contributions should be within this tenure. A definition of First Homes (from the relevant PPG (70-001)) can be found later in this document.

Gross Need for Affordable Home Ownership

- 4.86 The first part of the analysis seeks to understand what the gap between renting and buying actually means in the City Council area – in particular establishing the typical incomes that might be required. The information about incomes required to both buy and rent in different locations has already been provided earlier in this section and so the discussion below is a broad example.
- 4.87 Using the income distributions developed (as set out earlier in this section) along with data about price and rents, it has been estimated that of all households living in the private rented sector, around 30% already have sufficient income to buy a lower quartile home, with 27% falling in the rent/buy 'gap'. The final 43% are estimated to have an income below which they cannot afford to rent privately (i.e. would need to spend more than the calculated threshold of their income on housing costs) although in reality it should be noted that many households will spend a higher proportion of their income on housing. These figures have been based on an assumption that incomes in the private rented sector are around 88% of the equivalent figure for all households (a proportion derived from the English Housing Survey) and are used as it is clear that affordable home ownership products are likely to be targeted at households living in or who might be expected to access this sector (e.g. newly forming households).
- 4.88 The table below shows an estimate of the proportion of households living in the private rented sector who are able to afford different housing products by sub-area. This shows a similar proportion of households in the rent/buy gap in all areas, although the proportions able to afford to buy OR rent and unable to buy OR rent do vary, with affordability generally looking better in South Woodham Ferrers and worse in Rural locations.

Figure 4.21: Estimated proportion of households living in Private Rented Sector able to buy and/or rent market housing			
	Can afford to buy OR rent	Can afford to rent but not buy	Cannot afford to buy OR rent
Urban	33%	27%	40%
Rural	22%	27%	51%
South Woodham Ferrers	37%	31%	32%
TOTAL	30%	27%	43%

Source: Derived from Housing Market Cost Analysis and Affordability Testing

- 4.89 The finding that a proportion of households in the private rented sector are likely to have an income that would allow them to buy a home is also noteworthy and suggests for some households, barriers to accessing owner-occupation are less about income/the cost of housing and more about other factors (which could for example include the lack of a deposit or difficulties obtaining a mortgage (for example due to a poor credit rating or insecure employment)). However, some households will choose to privately rent, for example as it is a more flexible option that may be more suitable for a particular household's life stage (e.g. if moving locations with employment).

- 4.90 To study current need, an estimate of the number of household living in the Private Rented Sector (PRS) has been established, with the same (rent/buy gap) affordability test (as described above) then applied. The start point is the number of households living in private rented accommodation; as of the 2021 Census there were some 11,723 households living in the sector across the City Council area (renting from private landlord or letting agency).
- 4.91 Additional data from the EHS suggests that 60% of all PRS households expect to become an owner at some point (7,000 households if applied to Chelmsford) and of these some 40% (2,800 households) would expect this to happen in the next 2-years. These figures are taken as the number of households potentially with a current need for affordable home ownership before any affordability testing.
- 4.92 As noted above, on the basis of income it is estimated that around 30% of the private rented sector sit in the gap between renting and buying (varying by location). Applying this proportion to the above figures would suggest a current need for around 771 affordable home ownership units (41 per annum if annualised over a 19-year period).
- 4.93 In projecting forward, the analysis can consider newly forming households and also the remaining existing households who expect to become owners further into the future. Applying the same affordability test (albeit on a very slightly different income assumption for newly forming households) suggests an annual need from these two groups of around 482 dwellings (421 from newly forming households and 61 from existing households in the private rented sector).
- 4.94 Bringing together the above analysis suggests that there is a need for around 523 affordable home ownership homes (priced for households able to afford to rent but not buy) per annum across the City Council area. This is before any assessment of the potential supply of housing is considered.

Figure 4.22: Estimated Gross Need for Affordable Home Ownership by sub-area (per annum)

	Current need	Newly forming households	Existing households falling into need	Total Gross Need
Urban	29	268	43	340
Rural	8	112	12	132
South Woodham Ferrers	4	41	6	51
TOTAL	41	421	61	523

Source: Derived from a range of sources

Potential Supply of Housing to Meet the Affordable Home Ownership Need and Net Need

- 4.95 As with the need for social/affordable rented housing, it is also necessary to consider if there is any supply of affordable home ownership products from the existing stock of housing. As with assessing the need for affordable home ownership, it is the case that at present the PPG does not include any suggestions about how the supply of housing to meet these needs should be calculated.

- 4.96 One source is likely to be resales of low cost home ownership products with data from the Regulator of Social Housing showing a total stock in 2022 of 875 homes. If these homes were to turnover at the same rate seen for the social housing stock then they would be expected to generate around 22 resales each year. These properties would be available for these households and can be included as the potential supply.
- 4.97 In addition, it should be noted that the analysis looks at households unable to afford a lower quartile property price. By definition, a quarter of all homes sold will be priced at or below a lower quartile level. According to the Land Registry, in Chelmsford there were a total of 2,190 resales (i.e. excluding newly-built homes) in the last year (year to September 2022) and therefore around 548 would be priced below the lower quartile. This is 548 homes that would potentially be affordable to the target group for affordable home ownership products and is a potential supply that is in approaching of the level of need calculated.
- 4.98 It is then possible to provide a best estimate of the supply of lower quartile homes that are bought by the target group of households (assumed to be first-time buyers). Whilst dated, a report by Bramley and Wilcox in 2010 (Evaluating requirements for market and affordable housing) noted that around 40% of first-time buyer with a mortgage buy at or below the lower quartile¹. Other recent data suggests that first time buyers account for around half of home purchase loans² with a total of around 65% of all homes being bought with a loan (35% as cash buyers³).
- 4.99 Bringing this together would point to 32.5% of homes being bought by first-time buyers and around 13% of all homes being a lower quartile home bought by a first-time buyer (32.5% × 40%) – this would point to around half of all lower quartile sales as being to first-time buyers (as half of 25% is 12.5%). Therefore, for the purposes of estimating a ‘need’ half of all lower quartile sales are included in the supply.
- 4.100 We can therefore now provide three supply estimates which can be considered in the context of the estimated need. These are:
- Only count the supply from affordable home ownership resales (22 per annum);
 - Include the supply from affordable home ownership and half of resales of lower quartile homes (296 per annum (274+22)); and
 - Include the supply from affordable home ownership and all resales of lower quartile homes (570 per annum (548+22)).
- 4.101 The table below shows the estimated net need from applying these three supply scenarios. Only including the resales of AHO shows a need for 501 dwellings per annum and this reduces to 227 if 50% of lower quartile sales are included. If all lower quartile sales are included in the supply, then a surplus of affordable home ownership is shown. Overall, the analysis shows it is difficult to conclude what the need for affordable home ownership is.

¹ https://thinkhouse.org.uk/site/assets/files/1614/2010_20nhpau_202.pdf

² <https://www.mortgagesolutions.co.uk/news/2022/01/24/first-time-buyer-numbers-rose-to-nearly-410000-in-2021/#:~:text=First%2Dtime%20buyers%20accounted%20for,39%20per%20cent%20in%202009>

³ <https://www.ft.com/content/e0ad2830-094f-4e61-acaa-d77457e2edbb>

	AHO resales only	AHO resales plus 50% of LQ sales	AHO resales plus 100% of LQ sales
Total gross need	523	523	523
LCHO supply	22	296	570
Net need	501	227	-47

Source: Derived from a range of sources

- 4.102 Focussing on the middle of the three scenarios above (50% of lower quartile sales) the table below shows a need for affordable home ownership in all areas, but particularly in urban locations, likely to be linked to concentrations of private rented accommodation in this area.

	Total Gross Need	Supply	Net need
Urban	340	186	153
Rural	132	80	52
South Woodham Ferrers	51	29	22
TOTAL	523	296	227

Source: Derived from a range of sources

Implications of the Analysis

- 4.103 Given the analysis above, it would be reasonable to conclude that there is a need to provide housing under the definition of 'affordable home ownership' – although there is clearly a large range depending on the assumptions made about potential supply.
- 4.104 Regardless, it does seem that there are many households in Chelmsford who are being excluded from the owner-occupied sector (although they can afford private rented housing). This can be seen by analysis of tenure change, which saw the number of households living in private rented accommodation increasing by 29% from 2011 to 2021 (following a much higher increase in the 2001-11 period. Over the same period (2011-21), the number of owners with a mortgage decreased by 4%. That said, some households will choose to privately rent, for example as it is a more flexible option that may be more suitable for a particular household's life stage (e.g. if moving locations with employment).
- 4.105 On this basis, and as previously noted, it seems likely in Chelmsford that access to owner-occupation is being restricted by access to capital (e.g. for deposits, stamp duty, legal costs) as well as potentially some mortgage restrictions (e.g. where employment is temporary) rather than simply being due to the cost of housing to buy (although this will be a factor).

- 4.106 The NPPF (last updated in July 2021) gives a clear direction that 10% of all new housing (on larger sites) should be for affordable home ownership (in other words, if 20% of homes were to be affordable then half would be affordable home ownership) and it is now the case that policy compliant planning applications would be expected to deliver a minimum of 25% affordable housing as First Homes (as a proportion of the total affordable housing), with Councils being able to specify the requirement for any remaining affordable housing (subject to at least 10% of all housing being for AHO).
- 4.107 Firstly regarding the 10%, it is not clear that this is the best solution in the City Council area. The NPPF does provide some examples of where the 10% might not be required (paragraph 65), most notably that the 10% would be expected unless this would '*significantly prejudice the ability to meet the identified affordable housing needs of specific groups*'. In Chelmsford, the clear need for additional rented housing would arguably mean that providing the affordable home ownership would 'prejudice the ability' to meet the needs of the 'specific group' requiring rented accommodation.
- 4.108 Regarding the 25% of affordable housing as First Homes, it is not clear whether there is any scope to challenge the 'minimum of 25%', nor what role other tenures of affordable home ownership (such as shared ownership) might play. It is possible that provision of First Homes could squeeze out other forms of LCHO such as shared ownership, although it is likely that there will still be a role for this type of housing given typically lower deposit requirements.
- 4.109 Whilst there are clearly many households in the gap between renting and buying, they in some cases will be able to afford homes below lower quartile housing costs. That said, it is important to recognise that some households will have insufficient savings to be able to afford to buy a home on the open market (particularly in terms of the ability to afford a deposit) and low-cost home ownership homes – and shared ownership homes in particular – will therefore continue to play a role in supporting some households.
- 4.110 The evidence points to a clear and acute need for rented affordable housing for lower income households, and it is important that a supply of rented affordable housing is maintained to meet the needs of this group including those to which the authorities have a statutory housing duty. Such housing is notably cheaper than that available in the open market and can be accessed by many more households (some of whom may be supported by benefit payments).
- 4.111 There may also be a role for AHO on any 100% affordable housing schemes that may come forward (as well as through Section 106). Including a mix of both rented and intermediate homes to buy would make such schemes more viable, as well as enabling a range of tenures and therefore potential client groups to access housing.
- 4.112 In addition, it should also be noted that the finding of a 'need' for affordable home ownership does not have any impact on the overall need for housing. It seems clear that this group of households is simply a case of seeking to move households from one tenure to another (in this case from private renting to owner-occupation); there is therefore no net change in the total number of households, or the number of homes required.

How Much Should Affordable Home Ownership Homes Cost?

- 4.113 The analysis and discussion above suggest there are a number of households likely to fall under the PPG definition of needing affordable home ownership (including First Homes) – i.e. in the gap between renting and buying – but that the potential supply of low-cost housing to buy makes it difficult to fully quantify this need. However, given the NPPF, the Council may need to consider some additional homes on larger sites as some form of affordable home ownership (AHO).
- 4.114 The analysis below focusses on the cost of discounted market sale (which would include First Homes) to make them genuinely affordable before moving on to consider shared ownership (in this case suggestions are made about the equity shares likely to be affordable and whether these shares are likely to be offered). It is considered that First Homes and shared ownership are likely to be the main affordable home ownership tenures moving forward although it is accepted that some delivery may be of other products. This section also provides some comments about Rent to Buy housing.
- 4.115 The reason for the analysis to follow is that it will be important for the Council to ensure that any affordable home ownership is sold at a price that is genuinely affordable for the intended target group – for example there is no point in discounting a new market home by 30% if the price still remains above that for which a reasonable home can already be bought in the open market.

Discounted Market Sales Housing (focussing on First Homes)

- 4.116 In May 2021, MHCLG published a new Planning Practice Guidance (PPG) regarding First Homes. The key parts of this guidance are set out below:
First Homes are a specific kind of discounted market sale housing and should be considered to meet the definition of 'affordable housing' for planning purposes. Specifically, First Homes are discounted market sale units which:
- a) must be discounted by a minimum of 30% against the market value;*
 - b) are sold to a person or persons meeting the First Homes eligibility criteria (see below);*
 - c) on their first sale, will have a restriction registered on the title at HM Land Registry to ensure this discount (as a percentage of current market value) and certain other restrictions are passed on at each subsequent title transfer; and,*
 - d) after the discount has been applied, the first sale must be at a price no higher than £250,000 (or £420,000 in Greater London).*

First Homes are the government's preferred discounted market tenure and should account for at least 25% of all affordable housing units delivered by developers through planning obligations.

- 4.117 In terms of eligibility criteria, a purchaser should be a first-time buyer with a combined annual household income not exceeding £80,000 (or £90,000 in Greater London) and a mortgage needs to fund a minimum of 50% of the discounted purchase price. Local authorities can set their own eligibility criteria, which could for example involve lower income caps, a local connection test, or criteria based on employment status. Regarding discounts, a First Home must be sold at least 30% below the open market value. However, local authorities do have the discretion to require a higher minimum discount of either 40% or 50% (if they can demonstrate a need for this).

- 4.118 As noted above, the problem with having a percentage discount is that it is possible in some locations or types of property that such a discount still means that the discounted housing is more expensive than that typically available in the open market. This is often the case as new build housing itself attracts a premium. The preferred approach in this report is to set out a series of purchase costs for different sizes of accommodation which ensure these products are affordable for the intended group. These purchase costs are based on current lower quartile rental prices and also consideration of the income required to access the private rented sector and then estimating what property price this level of income might support (assuming a 10% deposit and a 4.5 times mortgage multiple). Below is an example of a calculation based on a 2-bedroom home:
- Previous analysis has shown that the lower quartile rent for a 2-bedroom home in Chelmsford is £895 per month;
 - On the basis of a household spending no more than 30% of their income on housing, a household would need an income of around £2,980 per month to afford ($£895/0.3$) or £35,800 per annum; and
 - With an income of £35,800, it is estimated that a household could afford to buy a home for around £179,000. This is based on assuming a 10% deposit (mortgage for 90% of value) and a 4.5 times mortgage multiple – calculated as $£35,800 \times 4.5/0.9$.
- 4.119 Therefore, £179,000 is a suggested purchase price to make First Homes/discounted home ownership affordable for households in the rent/buy gap in Chelmsford. This figure is essentially the equivalent price that is affordable to a household who can just afford to rent privately. In reality, there will be a range of incomes in the rent/buy gap and so some households could afford a higher price; however, setting all homes at a higher price would mean that some households will still be unable to afford.
- 4.120 On this basis, it is considered reasonable to look at the cost of First Homes as a range, from the equivalent private rent figure up to a midpoint of the cost of open market purchase and the relevant private rented figure (for a 2-bedroom home this is £240,000, giving a midpoint of £209,500). The use of a midpoint would mean that only around half of households in the rent/buy gap could afford, and therefore any housing provided at such a cost would need to also be supplemented by an equivalent number at a lower cost (which might include other tenures such as shared ownership).
- 4.121 To estimate what levels of discount these prices might equate to it is necessary to estimate the likely cost of a home prior to any discount; calculating the Open Market Value (OMV). This is not straightforward as housing costs will vary depending on location and the type of scheme, however, it is the case that homes will be newbuilds and are likely to attract a newbuild premium.
- 4.122 The table below shows the lower quartile cost of existing and new homes by type from Land Registry data; to boost the sample of new homes data from the last 5-years has been used. The analysis clearly identifies that newbuild homes are more expensive than existing homes in the stock although the overall average 'premium' (of 18%) will be influenced by the profile of homes.
- 4.123 If the figures for different dwelling types are standardised on the basis of the volume of newbuild sales in different categories then it is estimated that the typical newbuild premium in the City Council area is around 22% (slightly above the overall figure) – this figure has therefore been used in calculations of OMV and against which a discount can be judged.

	Existing dwellings	Newly-built dwellings	New-build premium
Flat/maisonette	£172,000	£242,000	41%
Terraced	£280,000	£395,000	41%
Semi-detached	£325,000	£400,000	23%
Detached	£430,000	£476,000	11%
All dwellings	£280,000	£330,000	18%

Source: Land Registry

- 4.124 The table below therefore sets out a suggested purchase price for affordable home ownership/First Homes. The tables also show an estimated OMV and the level of discount likely to be required to achieve affordability. As noted, the OMV is based on taking the estimated lower quartile price by size and adding 30%. It should be noted that the discounts are based on the OMV as estimated, in reality the OMV might be quite different for specific schemes and therefore the percentage discount would not be applicable. For example, if the OMV for a 2-bedroom home were to actually be £350,000 (rather than the modelled £292,800) then the discount would be up to 49%.
- 4.125 On the basis of the specific assumptions used, the analysis points to a discount of at least 30% for 2-bedroom homes and a figure potentially in excess of 40% for larger (3+-bedroom) properties. Given there is a cap of £250,000 on the purchase price (and looking at the estimated pricing below), it may be difficult for 4+-bedroom homes to be provided as First Homes. Given that a single discount figure is likely to be needed for plan making purposes it is suggested that a 30% discount is reasonable, with the expectation that most First Homes will be 2-bedroom – this is however based on the estimated OMV which could well be different on specific schemes (and which would therefore point to a different level of discount as being affordable).

	Affordable Price	Estimated newbuild OMV	Discount required
1-bedroom	£150,000-£165,000	£219,600	25%-32%
2-bedrooms	£179,000-£209,500	£292,800	28%-39%
3-bedrooms	£220,000-£297,500	£457,500	35%-52%
4+-bedrooms	£285,000-£405,000	£640,500	37%-56%

Source: Derived from a range of sources

- 4.126 It should also be noted that the analysis above is for the whole of the local authority area; the pricing of housing does vary across the City Council area and therefore adjustments to the figures might be appropriate in some instances. That said, affordable needs can be met anywhere in the authority (where opportunities arise) and so using an expectation of an authority-wide affordability calculation should ensure affordable products on sites regardless of location.

Key Points in Relation to First Homes

- 4.127 The paragraphs below seek to answer a series of questions in relation to First Homes. This should help the Council in deciding the appropriate approach, although ultimately there will be choices and decision to be made by the Council that this report can only comment on. Whilst the analysis above has focussed on pricing, the discussion below also draws on this information to consider whether there are any specific local criteria that could be applied.
- *Is there a justification for a discount of greater than 30%, if so, what should it be?*
- 4.128 Arguably there is a case to seek a discount in excess of 30% - a higher discount will certainly make homes cheaper and therefore potentially open up additional households as being able to afford. In addition, the analysis does suggest that larger homes could potentially need a higher discount to make them affordable (with 3-bedroom homes needing at least a 45% discount to get below the £250,000 cap).
- 4.129 However, providing a higher discount may well have an impact on viability, meaning the Council will not be able to provide as many homes in other tenures (such as rented affordable housing which is likely to be needed by those with more acute needs and fewer choices in the housing market). The Council could therefore investigate higher discounts, but it is not recommended to seek figures higher than 30%, unless this can be proven to not impact on overall affordable delivery
- *Is the maximum price of £250K after discount an appropriate maximum sales value?*
- 4.130 In Chelmsford the answer to this is certainly, yes. Chelmsford is a high price area and there is really no scope for this price cap to be lowered (it cannot be increased). As can be seen from previous analysis, a 30% price discount on a 2-bedroom home would still lead to an estimated purchase price of around £205,000 (a figure approaching the cap). A 30% discount on a 3-bedroom home is estimated to be likely to exceed the cap (at around £320,000).
- *Is the national threshold of £80,000 for household income appropriate?*
- 4.131 Given the conclusions regarding the price cap, and the fact that there is likely to be a link between prices and incomes (in terms of guidance) it seems reasonable that the upper end threshold is maintained. However, the analysis in this report assumes a household could secure a 4.5 times mortgage multiple (and a 10% deposit). Applying these figures to a £250,000 home would actually lead to an income of £50,000, however it is likely that many households with a higher income are currently unable to afford to buy a home and therefore the higher figure is reasonable. Additionally, it is unclear at this stage what size of multiple lenders might offer against a First Home.

- *What is the level of need for such products?*

4.132 In some ways, this is a difficult question to answer. The analysis is clear that there are likely to be a number of households whose incomes sit in the range of being able to afford to privately rent, but not being able to buy a home. It can be concluded that as long as First Homes are made available for an affordable price, it is likely there will be a strong demand (although some households in the rent/buy gap may not choose a discounted product given that the discount is held in perpetuity). Alternatively, it is possible that First Homes see demand from those who can technically afford housing in the existing market – this would not be meeting a need but would arguably provide some demand for this type of home.

4.133 Regardless of the need/demand, it is not recommended that the Council seek to reduce the amount of social/affordable rented homes by prioritising First Homes. The evidence does not support the Council in seeking more than 25% of affordable housing as First Homes.

- *Should the Council set local eligibility criteria?*

4.134 First Homes are designed to help people to get on the housing ladder in their local area, and in particular to ensure that key workers providing essential services are able to buy homes in the areas where they work. The Council can therefore prioritise key workers for First Homes, and are encouraged to do so, especially if they have an identified local need for certain professions.

4.135 To ensure First Homes are available to local residents and workers a local connection eligibility criteria could be used. This could be in-line with any criteria within local allocations policy and for example could require potential purchasers to demonstrate that they:

- Live in Chelmsford (for a period of time (possibly 2-years));
- Work over 16 hours a week in Chelmsford, or
- Have a close relative (parent, adult son or daughter or adult sibling) who has lived in Chelmsford for a period of time

4.136 Additional preference could be given to essential workers. Annex 2 of the NPPF also includes the needs of essential local workers '*Affordable housing: housing for sale or rent, for those whose needs are not met by the market (including housing that provided a subsidised route to home ownership and/or is for essential local workers*' [emphasis added]. Essential local workers are defined as '*Public sector employees who provide frontline services in areas including health, education and community safety – such as NHS staff, teachers, police, firefighters and military personnel, social care and childcare workers*'.

Shared Ownership

- 4.137 Whilst the Government has a clear focus on First Homes, they also see a continued role for Shared Ownership, launching a 'New Model for Shared Ownership' in early 2021 (following a 2020 consultation) – this includes a number of proposals, with the main one for the purposes of this assessment being the reduction of the minimum initial share from 25% to 10%. A key advantage of shared ownership over other tenures is that a lower deposit is likely to be required than for full or discounted purchase. Additionally, the rental part of the cost will be subsidised by a Registered Provider and therefore keeps monthly outgoings down.
- 4.138 For the purposes of the analysis in this report it is considered that for shared ownership to be affordable, total outgoings should not exceed that needed to rent privately.
- 4.139 Because shared ownership is based on buying part of a property, it is the case that the sale will need to be at open market value. Where there is a large gap between the typical incomes required to buy or rent, it may be the case that lower equity shares are needed for homes to be affordable (at the level of renting privately). The analysis below therefore seeks to estimate the typical equity share that might be affordable for different sizes of property with any share lower than 10% likely to be unavailable. The key assumptions used in the analysis are:
- OMV at LQ price plus 22% (reflecting likelihood that newbuild homes will have a premium attached and that they may well be priced above a LQ level) – it should be noted that this is an assumption for modelling purposes and consideration will need to be given to the OMV of any specific product;
 - 10% deposit on the equity share;
 - Rent at 2.75% pa on unsold equity;
 - Repayment mortgage over 25-years at 4% (this is taking a longer-term view and it is recognised interest rates in Spring 2023 are typically higher);
 - Service charge of £100 per month for flatted development (assumed to be 1- and 2-bedroom homes); and
 - It is also assumed that shared ownership would be priced for households sitting towards the bottom end of the rent/buy gap and so the calculations assume that total outgoings should be no higher than the equivalent private rent (lower quartile) cost for that size of property.
- 4.140 The table below shows that to make shared ownership affordable, equity shares in the region of around 27% could work for 1-bedroom homes, with much lower figures for other sizes of accommodation (a negative figure is calculated for homes with 4+-bedrooms). It seems likely that it will be quite difficult to make shared ownership 'work' for homes with 3+-bedrooms (and indeed possibly 2-bedrooms). The Council could consider additional rented homes of these sizes where it is difficult to make homes genuinely affordable.
- 4.141 As with conclusions on First Homes, it should also be noted that the analysis below is predicated on a particular set of assumptions (notably about likely OMV). In reality costs do vary across the area and will vary from site to site. Therefore, this analysis should be seen as indicative with specific schemes being tested individually to determine if the product being offered is genuinely (or reasonably) affordable.

	1-bedroom	2- bedrooms	3- bedrooms	4- bedrooms
OMV	£219,600	£292,800	£457,500	£640,500
Share	27%	17%	5%	-3%
Equity Bought	£59,700	£50,400	£21,000	-£17,300
Mortgage Needed	£53,800	£45,300	£18,900	-£15,600
Monthly Cost of Mortgage	£284	£239	£100	-£82
Retained Equity	£159,900	£242,400	£436,500	£657,800
Monthly Rent on Retained Equity	£366	£556	£1,000	£1,507
Service Charge per month	£100	£100	£0	£0
Total Cost per month	£750	£895	£1,100	£1,425

Source: Data based on Housing Market Cost Analysis

- 4.142 In policy terms, whilst the analysis has provided an indication of the equity shares possibly required by size, the key figure is actually the total cost per month (and how this compares with the costs to access private rented housing). For example, whilst the table suggests a 27% equity share for a 1-bedroom home, this is based on a specific set of assumptions. Were a scheme to come forward with a 27% share, but a total cost in excess of £750 per month, then it would be clear that a lower share is likely to be required to make the home genuinely affordable. Hence the actual share can only be calculated on a scheme-by-scheme basis. Any policy position should seek to ensure that outgoings are no more than can reasonably be achieved in the private rented sector, rather than seeking a specific equity share.

Rent to Buy

- 4.143 A further affordable option is Rent to Buy; this is a government scheme designed to ease the transition from renting to buying the same home. Initially (typically five years) the newly built home will be provided at the equivalent of an affordable rent (approximately 20% below the market rate). The expectation is that the discount provided in that first five years is saved in order to put towards a deposit on the purchase of the same property. Rent to Buy can be advantageous for some households as it allows for a smaller 'step' to be taken on to the home ownership ladder.
- 4.144 At the end of the five-year period, depending on the scheme, the property is either sold as a shared ownership product or to be purchased outright as a full market property. If the occupant is not able to do either of these then the property is vacated.
- 4.145 In order to access this tenure it effectively requires the same income threshold for the initial phase as a market rental property although the cost of accommodation will be that of affordable rent. The lower than market rent will allow the household to save for a deposit for the eventual shared ownership or market property. In considering the affordability of rent-to-buy schemes there is a direct read across to the income required to access affordable home ownership (including shared ownership), it should therefore be treated as part of the affordable home ownership products suggested by the NPPF.

Comments on Affordable Housing Policy

- 4.146 Policy DM2 of the adopted Local Plan deals with affordable housing with the main text setting out a target of 35% on larger sites (11 or more units). The policy itself does not set out a tenure split, although supporting text does explain that viability analysis worked on the basis of a 67:33 split between affordable rent housing and shared ownership.
- 4.147 On the basis of analysis in this report, it is recommended the Council test higher figures than the 35% - this is on the basis of a clear need for affordable housing as part of the general housing mix. A 40% target could be tested and it is also recommended the Council seeks to increase the proportion of rented homes within the mix, and to specifically set out social rented housing as a specific tenure – a 75:25 split between rented and affordable home ownership is considered reasonable in a local context.
- 4.148 Within the 75 figure for rented accommodation, it is recommended the Council seeks at least half as social rents and with the 25 home ownership proportion a maximum of half as First Homes might be appropriate. It is appreciated that this would provide only half the level desired by Government – but the evidence for Chelmsford is not one pointing to prioritisation of First Homes. Overall the following might be appropriate for viability testing:
- 40% target for affordable housing on sites of 10 or more dwellings;
 - 75% of affordable housing (30% of all housing) to be rented affordable homes, with at least half to comprise social rented
 - 25% of affordable housing (10% of all housing) to be affordable home ownership with no more than half of these to be First Homes (the remainder likely to be shared ownership)
- 4.149 This is a recommendation based on the analysis of need and does not take account of viability – it is possible a higher target would be viable; alternatively a lower target (such as the current 35%) could be maintained if this reduces significant site-by-site viability work being required (which will be an additional cost and may not end up delivering additional affordable housing). The Council will therefore need to balance a number of considerations in developing policy for the next Local Plan.

Affordable Housing Need: Key Messages

- Analysis has been undertaken to estimate the annual need for affordable housing. The analysis is split between a need for social/affordable rented accommodation (based on households unable to buy or rent in the market) and the need for affordable home ownership (AHO) – this includes housing for those who can afford to rent privately but cannot afford to buy a home.
- The analysis has taken account of local housing costs (to both buy and rent) along with estimates of household income. Additionally, when looking at rented needs, consideration is given to estimates of the supply of social/affordable rented housing. For AHO, consideration is given to the potential supply of resales of low-cost home ownership properties (such as shared ownership) and lower quartile sales of existing homes.
- When looking at needs from households unable to buy OR rent, the analysis suggests a need for 623 affordable homes per annum across the City Council area – a need is shown in all parts of the Council area.
- Despite the level of need being high in relation to the Standard Method, it is not considered that this points to any requirement for the Council to increase the Local Plan housing requirement due to affordable needs. The link between affordable need and overall need (of all tenures) is complex and in trying to make a link it must be remembered that many of those picked up as having an affordable need are already in housing (and therefore do not generate a net additional need for a home). That said, the level of affordable need does suggest the Council should maximise the delivery of such housing at every opportunity.
- The analysis suggests there will be a need for both social and affordable rented housing – the latter will be suitable particularly for households who are close to being able to afford to rent privately and possibly also for some households who claim full Housing Benefit. It is however clear that social rents are more affordable and could benefit a wider range of households – social rents could therefore be prioritised where delivery does not prejudice the overall delivery of affordable homes. Increasing in the number of people living in temporary accommodation also points to the need for social rented housing ahead of other tenures.
- When looking at AHO products, the analysis is inconclusive about the scale of the need. Although the evidence does suggest that there are many households in Chelmsford who are being excluded from the owner-occupied sector (as evidenced by increases in the size of the private rented sector). It is likely that a key issue in the City Council area is about access to capital (e.g. for deposits, stamp duty, legal costs) as well as potentially mortgage restrictions (e.g. where employment is temporary) rather than simply the cost of housing to buy.
- The study also considers different types of AHO (notably First Homes and shared ownership) as each will have a role to play – shared ownership is likely to be suitable for households with more marginal affordability (those only just able to afford to privately rent) as it has the advantage of a lower deposit and subsidised rent.
- However, given the cost of housing locally, it seems very difficult for affordable home ownership products to be provided and be considered as ‘genuinely affordable’. This again points to the need for the Council to prioritise delivery of rented affordable housing where possible.
- In deciding what types of affordable housing to provide, including a split between rented and home ownership products, the Council will need to consider the relative levels of need and also viability issues (recognising for example that providing AHO may be more viable and may therefore allow more units to be delivered, but at the same time noting that households with a need for rented housing are likely to have more acute needs and fewer housing options).

Affordable Housing Need: Key Messages (cont...)

- Overall, the analysis identifies a notable need for affordable housing, and it is clear that provision of new affordable housing is an important and pressing issue in the area. It does however need to be stressed that this report does not provide an affordable housing target; the amount of affordable housing delivered will be limited to the amount that can viably be provided. The evidence does however suggest that affordable housing delivery should be maximised where opportunities arise.

5. Housing Mix

Introduction

5.1 This section considers the appropriate mix of housing across Chelmsford, with a particular focus on the sizes of homes required in different tenure groups. This section looks at a range of statistics in relation to families (generally described as households with dependent children) before moving on to look at how the number of households in different age groups are projected to change moving forward.

Background Data

5.2 The number of families in Chelmsford (defined for the purpose of this assessment as any household which contains at least one dependent child) totalled 22,100 as of the 2021 Census, accounting for 29% of households; this proportion is similar to that seen in other areas. However, within this group a higher proportion of married couple households can be observed and relatively few lone parent and 'other' households.

	Chelmsford		Essex	East of England	England
	No.	%	%	%	%
Married couple	13,240	17.6%	15.3%	13.8%	14.4%
Cohabiting couple	3,202	4.2%	5.0%	5.1%	4.5%
Lone parent	4,303	5.7%	6.4%	6.5%	6.9%
Other households	1,366	1.8%	2.2%	2.4%	2.7%
All other households	53,289	70.7%	71.1%	72.2%	71.5%
Total	75,400	100.0%	100.0%	100.0%	100.0%
Total with dependent children	22,111	29.3%	28.9%	27.8%	28.5%

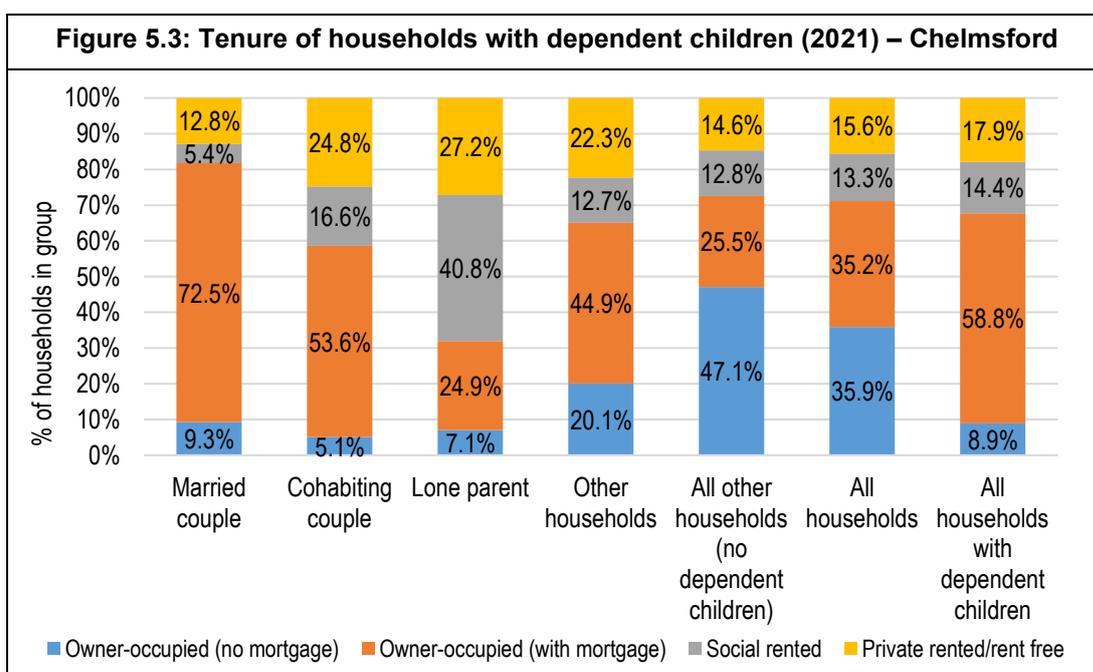
Source: Census (2021)

5.3 The table below shows the same information for each sub-area. The analysis shows broadly similar patterns across areas although Urban areas do have a slightly higher proportion of lone parent households.

	Urban	Rural	South Woodham Ferrers	TOTAL
Married couple	17.5%	17.5%	18.0%	17.6%
Cohabiting couple	4.3%	4.0%	4.5%	4.2%
Lone parent	6.1%	5.2%	5.1%	5.7%
Other households	1.8%	1.9%	1.7%	1.8%
All other households	70.3%	71.4%	70.7%	70.7%
Total	100.0%	100.0%	100.0%	100.0%
Total with dependent children	29.7%	28.6%	29.3%	29.3%

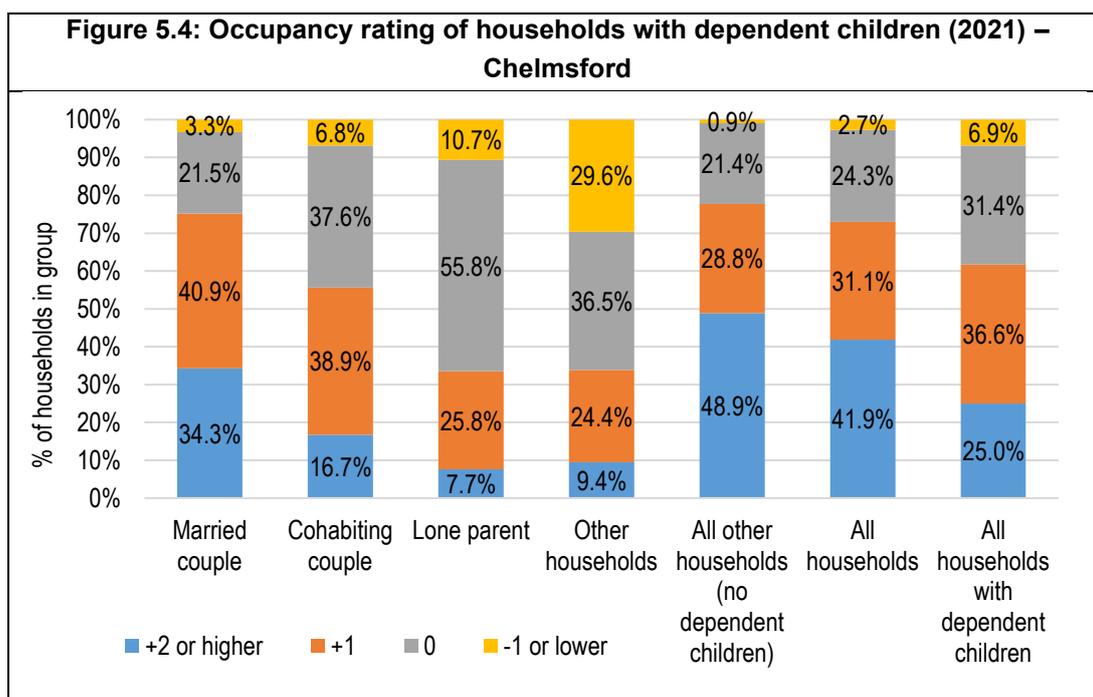
Source: Census (2021)

5.4 The figure below shows the current tenure of households with dependent children. There are some considerable differences by household type with lone parents having a very high proportion living in the social rented sector and also in private rented accommodation. In Chelmsford, only 32% of lone parent households are owner-occupiers compared with 82% of married couples with children.



Source: Census (2021)

5.5 The figure below shows levels of overcrowding and under-occupancy of households with dependent children. This shows higher levels of overcrowding for all household types with dependent children, including 11% of all lone parents and 30% of ‘other’ households being overcrowded. Overall, some 6.9% of households with dependent children are overcrowded, compared with 0.9% of other households. Levels of under-occupancy are also notably lower in households with dependent children.



The Mix of Housing

- 5.6 A model has been developed that starts with the current profile of housing in terms of size (bedrooms) and tenure. Within the data, information is available about the age of households and the typical sizes of homes they occupy. By using demographic projections, it is possible to see which age groups are expected to change in number, and by how much.
- 5.7 On the assumption that occupancy patterns for each age group (within each tenure) remain the same, it is therefore possible to assess the profile of housing needed is over the assessment period to 2041 (from 2022).
- 5.8 An important starting point is to understand the current balance of housing in the area – the table below profiles the sizes of homes in different tenure groups across areas. The data shows a market stock (owner-occupied) that is dominated by 3+ bedroom homes (making up 79% of the total in this tenure group, a slightly higher proportion to that seen in other locations). The profile of the social rented sector is broadly similar across areas as is the private rented sector. Observations about the current mix feed into conclusions about future mix later in this section.

		Chelmsford	Essex	East of England	England
Owner-occupied	1-bedroom	4%	4%	4%	4%
	2-bedrooms	17%	21%	20%	21%
	3-bedrooms	41%	41%	44%	46%
	4+-bedrooms	38%	33%	32%	29%
	Total	100%	100%	100%	100%
	Ave. no. beds	3.12	3.03	3.05	3.01
Social rented	1-bedroom	36%	32%	29%	29%
	2-bedrooms	32%	34%	35%	36%
	3-bedrooms	29%	30%	32%	31%
	4+-bedrooms	3%	4%	4%	4%
	Total	100%	100%	100%	100%
	Ave. no. beds	1.98	2.07	2.11	2.10
Private rented	1-bedroom	23%	21%	21%	21%
	2-bedrooms	40%	41%	38%	39%
	3-bedrooms	26%	29%	30%	29%
	4+-bedrooms	11%	10%	11%	11%
	Total	100%	100%	100%	100%
	Ave. no. beds	2.24	2.28	2.31	2.30

Source: Census (2021)

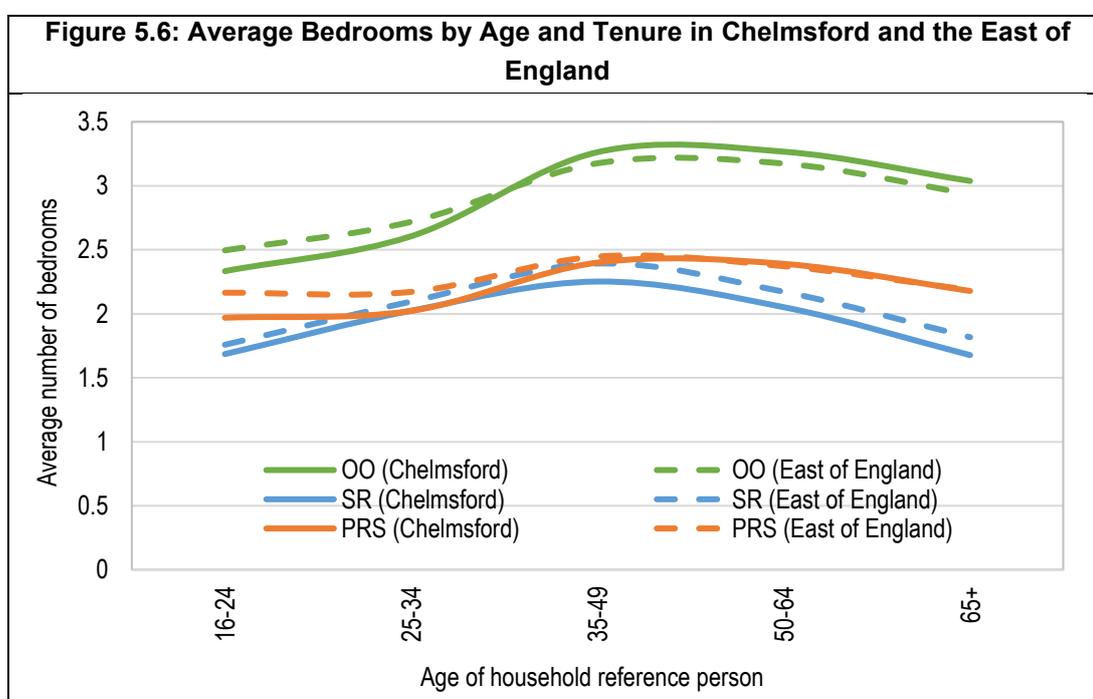
Overview of Methodology

- 5.9 The method to consider future housing mix looks at the ages of the Household Reference Persons and how these are projected to change over time. The sub-sections to follow describe some of the key analysis.

Understanding How Households Occupy Homes

- 5.10 Whilst the demographic projections provide a good indication of how the population and household structure will develop, it is not a simple task to convert the net increase in the number of households into a suggested profile for additional housing to be provided. The main reason for this is that in the market sector, households are able to buy or rent any size of property (subject to what they can afford) and therefore knowledge of the profile of households in an area does not directly transfer into the sizes of property to be provided.
- 5.11 The size of housing which households occupy relates more to their wealth and age than the number of people they contain. For example, there is no reason why a single person cannot buy (or choose to live in) a 4-bedroom home as long as they can afford it, and hence projecting an increase in single person households does not automatically translate into a need for smaller units.
- 5.12 That said, issues of supply can also impact occupancy patterns, for example it may be that a supply of additional smaller bungalows (say 2-bedrooms) would encourage older people to downsize but in the absence of such accommodation these households remain living in their larger accommodation.

- 5.13 The issue of choice is less relevant in the affordable sector (particularly since the introduction of the social sector size criteria) where households are allocated properties which reflect the size of the household, although there will still be some level of under-occupation moving forward with regard to older person and working households who may be able to under-occupy housing (e.g. those who can afford to pay the spare room subsidy ('bedroom tax')).
- 5.14 The approach used is to interrogate information derived in the projections about the number of household reference persons (HRPs) in each age group and apply this to the profile of housing within these groups (data being drawn from the 2021 Census).
- 5.15 The figure below shows an estimate of how the average number of bedrooms varies by different ages of HRP and broad tenure group for Chelmsford and the East of England region. In all sectors the average size of accommodation rises over time to typically reach a peak around the age of 50. After peaking, the average dwelling size decreases – as typically some households downsize as they get older. The analysis identifies only modest differences between Chelmsford and the region across all tenures.



- 5.16 Replicating the existing occupancy patterns at a local level would however result in the conclusions being skewed by the existing housing profile. On this basis a further model has been developed that applies regional occupancy assumptions for the East of England region. Assumptions are applied to the projected changes in Household Reference Person by age discussed below.

5.17 The analysis has been used to derive outputs for three broad categories. These are:

- **Market Housing** – which is taken to follow the occupancy profiles in the owner-occupied sector;
- **Affordable Home Ownership** – which is taken to follow the occupancy profile in the private rented sector (this is seen as reasonable as the Government’s desired growth in home ownership looks to be largely driven by a wish to see households move out of private renting); and
- **Rented Affordable Housing** – which is taken to follow the occupancy profile in the social rented sector. The affordable sector in the analysis to follow would include social and affordable rented housing.

Changes to Households by Age

5.18 The table below presents the projected change in households by age of household reference person, this shows growth as being expected in many age groups and in particular older age groups. The number of households headed by someone aged 50-64 is projected to see a more modest increase over the period studied.

	2022	2041	Change in Households	% Change
16-24	1,340	2,051	711	53.1%
25-34	8,931	11,524	2,593	29.0%
35-49	21,045	24,046	3,001	14.3%
50-64	21,900	24,010	2,110	9.6%
65-74	10,159	13,586	3,427	33.7%
75-84	9,017	12,178	3,161	35.1%
85+	3,894	6,507	2,613	67.1%
TOTAL	76,285	93,901	17,616	23.1%

Source: Demographic Projections

Initial Modelled Outputs

5.19 By following the methodology set out above and drawing on the sources shown, a series of outputs have been derived to consider the likely size requirement of housing within each of the three broad tenures at a local authority level. Two tables are provided, considering both local and regional occupancy patterns. The data linking to local occupancy will to some extent reflect the role and function of the local area, whilst the regional data will help to establish any particular gaps (or relative surpluses) of different sizes/tenures of homes when considered in a wider context.

5.20 The analysis for rented affordable housing can also draw on data from the local authority Housing Register with regards to the profile of need. The data has been taken from a spreadsheet provided by the Council in October 2022 and shows a pattern of need which is focussed on 1- and 2-bedroom homes but in excess of a third of households as requiring 3+-bedroom accommodation (including 10% in the 4+-bedroom category).

Figure 5.8: Size of Social/Affordable Rented Housing – Housing Register Information		
	Number of households	% of households
1-bedroom	339	38%
2-bedrooms	241	27%
3-bedrooms	234	26%
4+-bedrooms	88	10%
TOTAL	902	100%

Source: Chelmsford Council

- 5.21 The tables below show the modelled outputs of need by dwelling size in the three broad tenures. Tables are providing by linking to local and regional occupancy patterns with a further table combining the outputs from the two models.

Figure 5.9: Modelled Mix of Housing by Size and Tenure in Chelmsford (linked to local occupancy patterns)				
	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Market	5%	19%	43%	34%
Affordable home ownership	25%	40%	24%	10%
Affordable housing (rented)	38%	32%	27%	3%

Source: Housing Market Model

Figure 5.10: Modelled Mix of Housing by Size and Tenure in Chelmsford (linked to regional occupancy patterns)				
	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Market	4%	23%	45%	29%
Affordable home ownership	22%	39%	29%	10%
Affordable housing (rented)	31%	35%	31%	4%

Source: Housing Market Model

Figure 5.11: Modelled Mix of Housing by Size and Tenure in Chelmsford (combining methodologies)				
	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Market	4%	21%	44%	31%
Affordable home ownership	24%	40%	26%	10%
Affordable housing (rented)	35%	33%	29%	3%

Source: Housing Market Model

Adjustments for Under-Occupation and Overcrowding

- 5.22 The analysis above sets out the potential need for housing if occupancy patterns remained the same as they were in 2021 (with differences from the current stock profile being driven by demographic change). It is however worth also considering that the 2021 profile will have included households who are overcrowded (and therefore need a larger home than they actually live in) and also those who under-occupy (have more bedrooms than they need).

- 5.23 Whilst it would not be reasonable to expect to remove all under-occupancy (particularly in the market sector) it is the case that in seeking to make the most efficient use of land it would be prudent to look to reduce this over time. Indeed, in the future there may be a move away from current (2021) occupancy patterns due to affordability issues (or eligibility in social rented housing) as well as the type of stock likely to be provided (potentially a higher proportion of flats). Further adjustments to the modelled figures above have therefore been made to take account of overcrowding and under-occupancy (by tenure).
- 5.24 The table below shows a cross-tabulation of a household's occupancy rating and the number of bedrooms in their home (for owner-occupiers). This shows a high number of households with at least 2 spare bedrooms who are living in homes with 3 or more bedrooms. There are also a small number of overcrowded households. Overall, in the owner-occupied sector in 2021, there were 46,500 households with some degree of under-occupation and just 550 overcrowded households.

Figure 5.12: Cross-tabulation of occupancy rating and number of bedrooms (owner-occupied sector) – Chelmsford					
Occupancy rating	Number of bedrooms				
	1-bed	2-bed	3-bed	4+-bed	TOTAL
+2	0	0	12,799	16,386	29,185
+1	0	7,267	6,785	3,242	17,294
0	2,269	1,539	2,376	419	6,603
-1	89	159	214	86	548
TOTAL	2,358	8,965	22,174	20,133	53,630

Source: Census (2021)

- 5.25 For completeness the tables below show the same information for the social and private rented sectors. In both cases there are more under-occupying households than overcrowded, but differences are less marked than seen for owner-occupied housing.

Figure 5.13: Cross-tabulation of occupancy rating and number of bedrooms (social rented sector) – Chelmsford					
Occupancy rating	Number of bedrooms				
	1-bed	2-bed	3-bed	4+-bed	TOTAL
+2	0	0	707	127	834
+1	0	1,126	804	74	2,004
0	3,454	1,747	1,100	75	6,376
-1	169	352	258	22	801
TOTAL	3,623	3,225	2,869	298	10,015

Source: Census (2021)

Figure 5.14: Cross-tabulation of occupancy rating and number of bedrooms (private rented sector) – Chelmsford					
Occupancy rating	Number of bedrooms				
	1-bed	2-bed	3-bed	4+-bed	TOTAL
+2	0	0	886	695	1,581
+1	0	2,518	1,262	368	4,148
0	2,494	1,884	849	140	5,367
-1	236	271	115	38	660
TOTAL	2,730	4,673	3,112	1,241	11,756

Source: Census (2021)

- 5.26 In using this data in the modelling an adjustment is made to move some of those who would have been picked up in the modelling as under-occupying into smaller accommodation. Where there is under-occupation by 2 or more bedrooms, the adjustment takes 25% of this group and assigns to a '+1' occupancy rating and a further 12.5% (i.e. an eighth) to a '0' rating. For households with one spare bedroom, 12.5% are assigned to a '0' rating (with the others remaining as '+1'). These do need to be recognised as assumptions, but can be seen to be reasonable as they do retain some degree of under-occupation (which is likely) but does also seek to model a better match between household needs and the size of their home. For overcrowded households a move in the other direction is made, in this case households are moved up as many bedrooms as is needed to resolve the problems.
- 5.27 The adjustments for under-occupation and overcrowding lead to the suggested mix as set out in the following table. It can be seen that this tends to suggest a smaller profile of homes as being needed (compared to the initial modelling) with the biggest change being in the market sector – which was the sector where under-occupation is currently most notable.

Figure 5.15: Adjusted Modelled Mix of Housing by Size and Tenure – Chelmsford				
	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Market	9%	33%	38%	20%
Affordable home ownership	25%	42%	24%	8%
Affordable housing (rented)	35%	34%	25%	5%

Source: Housing Market Model (with adjustments)

- 5.28 Across the study area, the analysis points to just over a third of the social/affordable housing need being for 1-bedroom homes and it is of interest to see how much of this is due to older person households. In the future household sizes are projected to drop whilst the population of older people will increase. Older person households (as shown earlier) are more likely to occupy smaller dwellings. The impacts of older people have on demand for smaller stock is outlined in the table below.
- 5.29 This indeed identifies a larger profile of homes needed for households where the household reference person is aged Under 65, with a concentration of 1-bedroom homes for older people. This information can be used to inform the mix required for General Needs rather than Specialist housing, although it does need to be noted that not all older people would be expected to live in homes with some form of care or support.

Age of HRP	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Under 65	28%	37%	28%	7%
65 and over	54%	26%	20%	
All affordable housing (rented)	35%	34%	25%	5%

Source: Housing Market Model (with adjustments)

- 5.30 A further analysis of the need for rented affordable housing is to compare the need with the supply (turnover) of different sizes of accommodation. This links back to estimates of need in the previous section (an annual need for 623 dwellings per annum) with additional data from CoRe about the sizes of homes let over the past three years.
- 5.31 This analysis is quite clear in showing the very low supply of larger homes relative to the need. For 4+-bedroom accommodation, it is estimated the supply is only around 6% of the need arising each year, whereas for 1-bedroom homes around 38% of the need can be met.

	Gross Annual Need	Gross Annual Supply	Net Annual Need	As a % of total net annual need	Supply as a % of gross need
1-bedroom	280	105	175	28.0%	37.6%
2-bedrooms	323	92	230	37.0%	28.6%
3-bedrooms	211	34	177	28.5%	16.0%
4+-bedrooms	43	3	41	6.5%	6.3%
Total	857	234	623	100.0%	27.3%

Source: Derived from a range of sources

Indicative Targets for Different Sizes of Property by Tenure

- 5.32 The analysis below provides some indicative targets for different sizes of home (by tenure). The conclusions take account of a range of factors, including the modelled outputs and an understanding of the stock profile. The analysis (for rented affordable housing) also draws on the Housing Register data as well as taking a broader view of issues such as the flexibility of homes to accommodate changes to households (e.g. the lack of flexibility offered by a 1-bedroom home for a couple looking to start a family) – the analysis also reflects the availability of stock of different dwelling sizes.

Social/Affordable Rented Housing

- 5.33 Bringing together the above, a number of factors are recognised. This includes recognising that it is unlikely that all affordable housing needs will be met and that it is likely that households with a need for larger homes will have greater priority (as they are more likely to contain children and also have a lower turnover). That said, there will be a need for 1-bedroom social housing arising due to homelessness which the Council will give a reasonable priority (typically such homeless households are more likely to be younger single people).

- 5.34 As noted, the conclusions also consider the Housing Register (and also take account of the current profile of housing in this sector). In taking account of the modelled outputs, the Housing Register and the discussion above, it is suggested that the following mix of social/affordable rented housing would be appropriate – separated into general needs and housing for older people:

General Needs	Housing for Older People
• 1-bedroom: 25%	• 1-bedroom: 55%
• 2-bedroom: 35%	• 2+-bedroom: 45%
• 3-bedroom: 30%	
• 4+-bedroom: 10%	

Affordable Home Ownership

- 5.35 In the affordable home ownership and market sectors a profile of housing that closely matches the outputs of the modelling is suggested. It is considered that the provision of affordable home ownership should be more explicitly focused on delivering smaller family housing for younger households. Based on this analysis, it is suggested that the following mix of affordable home ownership would be appropriate (although it is recognised that analysis did not definitively show a need for this tenure of housing):

- 1-bedroom: 25%
- 2-bedroom: 45%
- 3-bedroom: 25%
- 4+-bedroom: 5%

Market Housing

- 5.36 Finally, in the market sector, a balance of dwellings is suggested that takes account of both the demand for homes and the changing demographic profile (as well as observations about the current mix when compared with other locations and also the potential to slightly reduce levels of under-occupancy). The conclusions have also slightly boosted figures for larger (4+-bedroom) homes to provide more flexibility and to recognise the potential for a general increase in home working (and therefore households seeking an extra room/bedroom to use as office space). This sees a larger recommended profile compared with other tenure groups – figures for market housing have been set out as a range as this is likely to allow a more flexible approach in policy terms and will make it more practical for the Council to monitor delivery.

- 1-bedroom: 5-10%
- 2-bedroom: 30-35%
- 3-bedroom: 35-40%
- 4+-bedroom: 20-25%

- 5.37 Although the analysis has quantified this on the basis of the market modelling and an understanding of the current housing market, it does not necessarily follow that such prescriptive figures should be included in the plan making process (although it will be useful to include an indication of the broad mix to be sought across the study area) – demand can change over time linked to macro-economic factors and local supply. Policy aspirations could also influence the mix sought.
- 5.38 The suggested figures can be used as a monitoring tool to ensure that future delivery is not unbalanced when compared with the likely requirements as driven by demographic change in the area. The recommendations can also be used as a set of guidelines to consider the appropriate mix on larger development sites, and the Council could expect justification for a housing mix on such sites which significantly differs from that modelled herein. Site location and area character are also however relevant considerations the appropriate mix of market housing on individual development sites.

Built-form

- 5.39 A final issue is a discussion of the need/demand for different built-forms of homes. In particular this discussion focusses on bungalows and the need for flats vs. houses.

Bungalows

- 5.40 The sources used for analysis in this report make it difficult to quantify a need/demand for bungalows in the City Council area as Census data (which is used to look at occupancy profiles) does not separately identify this type of accommodation. Data from the Valuation Office Agency (VOA) does however provide estimates of the number of bungalows (by bedrooms) although no tenure split is available.
- 5.41 The table below shows a notable proportion of homes in Chelmsford are bungalows (9% of all flats and houses) with about half of these having 2-bedrooms, and a further 27% 3-bedrooms); a similar proportion (9%) of homes across England are bungalows.

	Number of bedrooms					All
	1	2	3	4+	Not Known	
Bungalow	1,070	3,230	1,800	500	10	6,610
Flat/Maisonette	6,930	8,020	470	80	30	15,530
Terraced house	760	3,890	10,450	1,490	-	16,590
Semi-detached house	50	2,240	13,670	2,610	-	18,580
Detached house	30	550	5,720	12,400	30	18,730
All flats/houses	8,840	17,930	32,110	17,080	70	76,040
Annexe	-	-	-	-	-	200
Other	-	-	-	-	-	750
Unknown	-	-	-	-	-	240
All properties	-	-	-	-	-	77,230

Source: Valuation Office Agency

- 5.42 In general, discussions with local estate agents (discussions nationally) find that there is a demand for bungalows and in addition, analysis of survey data (in other locations) points to a high demand for bungalows (from people aged 65 and over in particular).
- 5.43 Bungalows are often the first choice for older people seeking suitable accommodation in later life and there is generally a high demand for such accommodation when it becomes available (this is different from specialist accommodation for older people which would have some degree of care or support).
- 5.44 As a new build option, bungalows are often not supported by either house builders or planners (due to potential plot sizes and their generally low densities). There may, however, be instances where bungalows are the most suitable house type for a particular site; for example, to overcome objections about dwellings overlooking existing dwellings or preserving sight lines.
- 5.45 There is also the possibility of a wider need/demand for retirement accommodation. Retirement apartments can prove very popular if they are well located in terms of access to facilities and services, and environmentally attractive (e.g. have a good view). However, some potential purchasers may find high service charges unacceptable or unaffordable and new build units may not retain their value on re-sale.
- 5.46 Overall, the Council should consider the potential role of bungalows as part of the future mix of housing. Such housing may be particularly attractive to older owner-occupiers (many of whom are equity-rich) which may assist in encouraging households to downsize. However, the downside to providing bungalows is that they are relatively land intensive.
- 5.47 Bungalows are likely to see a particular need and demand in the market sector and also for rented affordable housing (for older people as discussed in the next section of the report). Bungalows are likely to particularly focus on 2-bedroom homes, including in the affordable sector where such housing may encourage households to move from larger 'family-sized' accommodation (with 3+-bedrooms).

Flats versus Houses

- 5.48 Although there are some 1-bedroom houses and 3-bedroom flats, it is considered that the key discussion on built-form will be for 2-bedroom accommodation, where it might be expected that there would be a combination of both flats and houses. At a national level, 82% of all 1-bedroom homes are flats, 38% of 2-bedroom homes and just 5% of homes with 3-bedrooms.
- 5.49 The table below shows (for 2-bedroom accommodation) the proportion of homes by tenure that are classified as a flat, maisonette or apartment in Chelmsford, the region and England. This shows a relatively high proportion of flats in Chelmsford (45% of all 2-bedroom homes) although this would arguably point to the majority of 2-bedroom homes in the future being houses. The analysis does also show a higher proportion of flats in the social and private rented sectors (over half of 2-bedroom homes in these sectors are flats).

	Chelmsford	East of England	England
Owner-occupied	32%	20%	25%
Social rented	54%	42%	48%
Private rented	65%	47%	52%
All (2-bedroom)	45%	32%	38%

Source: 2021 Census

5.50 For completeness, the table below shows the proportion of flats in Chelmsford for all sizes of accommodation and different tenures. Of particular note is the very small proportion of 3+-bedroom homes as flats.

	1-bedroom	2-bedrooms	3-bedrooms	4+-bedrooms
Owner-occupied	69%	32%	1%	0%
Social rented	75%	54%	3%	17%
Private rented	82%	65%	8%	5%
All	76%	45%	2%	1%

Source: 2021 Census

5.51 As noted, this analysis would suggest that most 2-bedroom homes should be built as houses (or bungalows) rather than flats although the proportion of flatted development is significant. Any decisions will have to take account of site characteristics, which in some cases might point towards flatted development as being most appropriate. The analysis would suggest that the affordable sector might be expected to see a higher proportion of flats than for market housing.

Housing Mix: Key Messages

- Analysis of the future mix of housing required takes account of demographic change, including potential changes to the number of family households and the ageing of the population. The proportion of households with dependent children in Chelmsford is fairly average with around 29% of all households containing dependent children in 2021 (compared with around 28% regionally and 29% nationally). There are notable differences between different types of household, with married couples (with dependent children) seeing a high level of owner-occupation, whereas as lone parents are particularly likely to live in social or private rented accommodation.
- There are a range of factors which will influence demand for different sizes of homes, including demographic changes; future growth in real earnings and households' ability to save; economic performance and housing affordability. The analysis linked to future demographic change concludes that the following represents an appropriate mix of affordable and market homes, this takes account of both household changes and the ageing of the population – the analysis also models for there to be a modest decrease in levels of under-occupancy (which in Chelmsford is notable in the market sector).
- In all sectors the analysis points to a particular need for 2-bedroom accommodation, with varying proportions of 1-bedroom and 3+-bedroom homes. For rented affordable housing there is a clear need for a range of different sizes of homes, including 40% of general needs housing to have at least 3-bedrooms. Our recommended mix is set out below:

	Market	Affordable home ownership	Affordable housing (rented)	
			General needs	Older persons
1-bedroom	5-10%	25%	25%	55%
2-bedrooms	30-35%	45%	35%	45%
3-bedrooms	35-40%	25%	30%	
4+-bedrooms	20-25%	5%	10%	

- The strategic conclusions in the affordable sector recognise the role which delivery of larger family homes can play in releasing a supply of smaller properties for other households. Also recognised is the limited flexibility which 1-bedroom properties offer to changing household circumstances, which feed through into higher turnover and management issues. The conclusions also take account of the current mix of housing by tenure and also the size requirements shown on the Housing Register.
- The mix identified above could inform strategic policies although a flexible approach should be adopted. For example, in some areas Registered Providers find difficulties selling 1-bedroom affordable home ownership (AHO) homes and therefore the 1-bedroom elements of AHO might be better provided as 2-bedroom accommodation. That said, this report also highlighted potential difficulties in making (larger) AHO genuinely affordable.
- Additionally, in applying the mix to individual development sites, regard should be had to the nature of the site and character of the area, and to up-to-date evidence of need as well as the existing mix and turnover of properties at the local level. The Council should also monitor the mix of housing delivered.
- Given the nature of the area and the needs identified, the analysis suggests that units would comprise a mix of both houses and flats although consideration will need to be given to site specific circumstances (which may in some cases lend themselves to a particular type of development). There is potentially a demand for bungalows, although realistically significant delivery of this type of accommodation may be unlikely. It is however possible that delivery of some bungalows might be particularly attractive to older person households downsizing and may help to release larger (family-sized) accommodation back into family use.

6. Older and Disabled People

Introduction

- 6.1 This section studies the characteristics and housing needs of the older person population and the population with some form of disability. The two groups are taken together as there is a clear link between age and disability. It responds to Planning Practice Guidance on *Housing for Older and Disabled People* published by Government in June 2019. It includes an assessment of the need for specialist accommodation for older people and the potential requirements for housing to be built to M4(2) and M4(3) housing technical standards (accessibility and wheelchair standards).

Understanding the Implications of Demographic Change

- 6.2 The population of older persons is increasing, and this will potentially drive a need for housing which is capable of meeting the needs of older persons. Initially below a series of statistics about the older person population of Chelmsford are presented.

Current Population of Older People

- 6.3 The table below provides baseline population data about older persons in Chelmsford and compares this with other areas. The population data has been taken from 2021 mid-year population estimates (as updated to take account of Census data). The table shows that Chelmsford has a similar age structure to other areas with 19% of the population being aged 65 and over, this compares with 20% regionally and 19% nationally.

	Chelmsford	Essex	East of England	England
Under 65	80.6%	79.3%	80.3%	81.5%
65-74	10.1%	10.8%	10.3%	9.8%
75-84	6.6%	7.1%	6.7%	6.2%
85+	2.7%	2.8%	2.7%	2.5%
Total	100.0%	100.0%	100.0%	100.0%
Total 65+	19.4%	20.7%	19.7%	18.5%
Total 75+	9.3%	9.9%	9.4%	8.7%

Source: ONS

- 6.4 The table below shows similar information for sub-areas – in this case taken from the 2021 Census. This shows some variation in the proportion of people aged 65 and over, ranging from 17% in the Urban area, up to 24% of the population in Rural locations.

	Urban	Rural	South Woodham Ferrers	TOTAL
Under 65	83.0%	76.4%	79.8%	80.6%
65-74	8.8%	12.0%	12.6%	10.2%
75-84	5.7%	8.4%	5.6%	6.6%
85+	2.5%	3.2%	2.0%	2.7%
Total	100.0%	100.0%	100.0%	100.0%
Total 65+	17.0%	23.6%	20.2%	19.4%
Total 75+	8.2%	11.6%	7.7%	9.2%

Source: 2021 Census

Projected Future Change in the Population of Older People

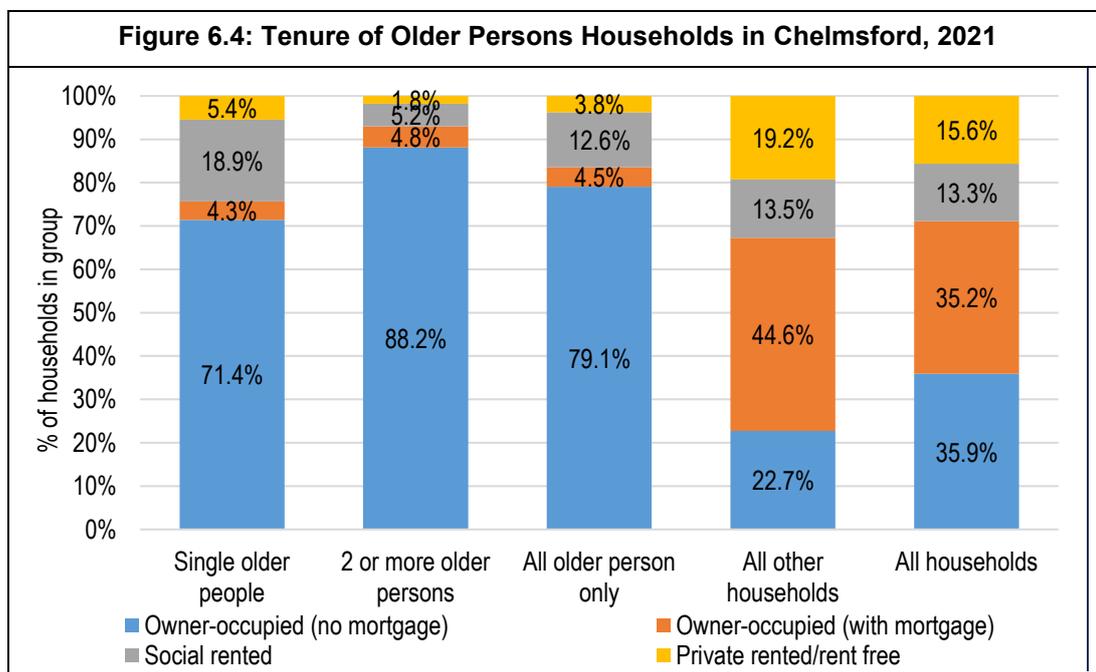
- 6.5 Population projections can next be used to provide an indication of how the number of older persons might change in the future with the table below showing that Chelmsford is projected to see a notable increase in the older person population. The Standard Method projection shows a projected increase in the population aged 65+ of around 35% - the population aged Under 65 is in contrast projected to increase by a more modest 15%.
- 6.6 In total population terms, the projections show an increase in the population aged 65 and over of 12,500 people. This is against a backdrop of an overall increase of 34,700 – population growth of people aged 65 and over therefore accounts for 36% of the total projected population change.

	2022	2041	Change in population	% change
Under 65	147,888	170,094	22,206	15.0%
65-74	17,754	22,148	4,394	24.7%
75-84	12,936	17,446	4,510	34.9%
85+	5,101	8,678	3,578	70.1%
Total	183,678	218,366	34,688	18.9%
Total 65+	35,790	48,272	12,481	34.9%
Total 75+	18,036	26,124	8,088	44.8%

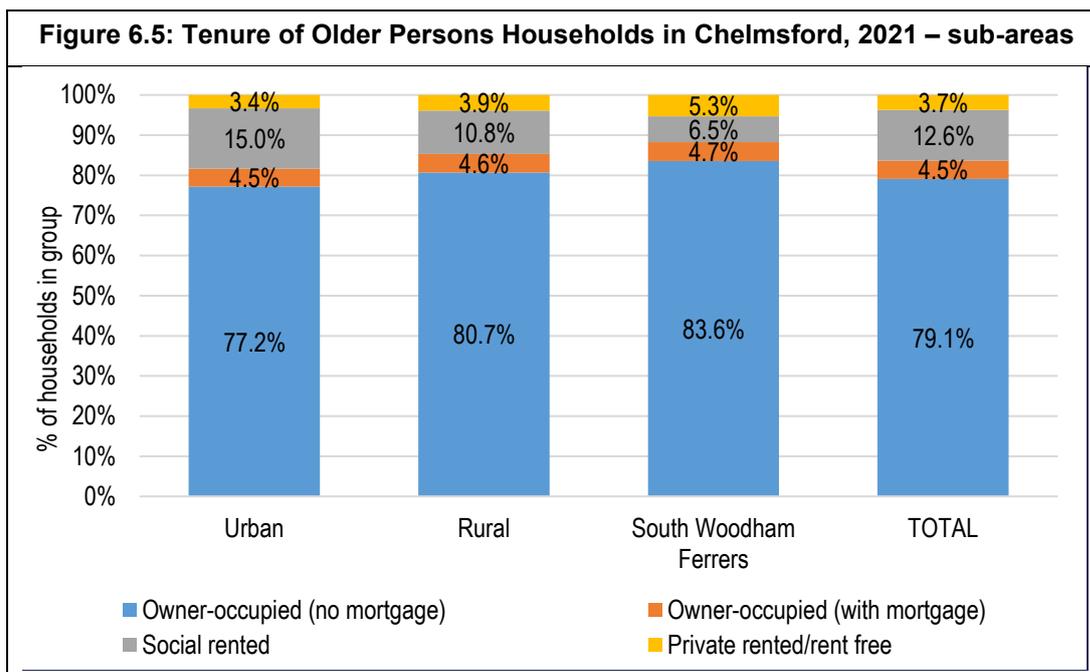
Source: Demographic projections

Characteristics of Older Person Households

- 6.7 The figure below shows the tenure of older person households. The data has been split between single older person households and those with two or more older people (which will largely be couples). The data shows that the majority of older persons households are owner occupiers (84% of older person households), and indeed most are owner occupiers with no mortgage and thus may have significant equity which can be put towards the purchase of a new home. Some 12% of older persons households across the City Council area live in the social rented sector; the proportion of older person households living in the private rented sector is relatively low (about 4%).
- 6.8 There are also notable differences for different types of older person households with single older people having a much lower level of owner-occupation than larger older person households – this group also has a much higher proportion living in the social rented sector.



- 6.9 The figure below shows the same information for sub-areas – the data is provided for all older person households. The data shows that the tenure profile of older person households varies slightly across the City Council area although all areas see the majority of older person households as owner-occupiers (largely mortgage free).



Source: 2021 Census

Prevalence of Disabilities

6.10 The table below shows the proportion of people who are disabled under the Equality Act drawn from 2021 Census data, and the proportion of households where at least one person has a disability. The data suggests that some 27% of households in Chelmsford contain someone with a disability. This figure is below that seen across Essex, the East of England and nationally. The figures for the population with a disability show a similar pattern when compared with other locations – some 14% of the population having a disability.

Figure 6.6: Households and People with a Disability, 2021

	Households Containing Someone with a Disability		Population with a Disability	
	No.	%	No.	%
Chelmsford	20,630	27.4%	26,188	14.4%
Essex	194,096	31.0%	250,552	16.7%
East of England	811,942	30.9%	1,053,832	16.6%
England	7,507,886	32.0%	9,774,510	17.3%

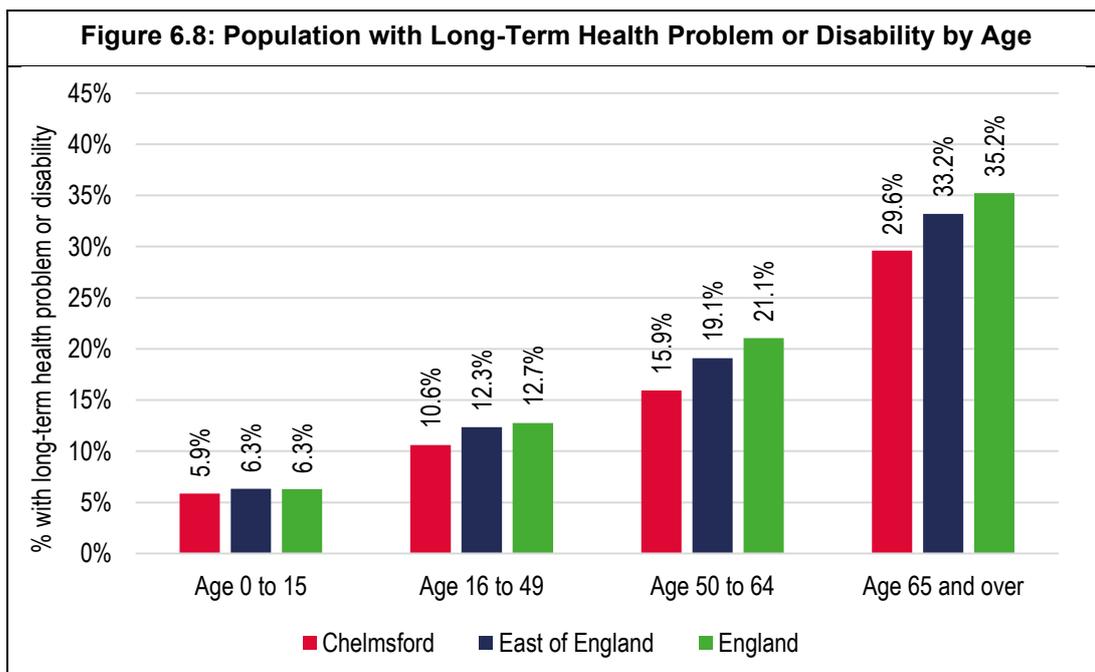
Source: 2021 Census

6.11 The analysis also shows some differences between different parts of the City Council area although there are no clear patterns – all areas see a proportion of population and households with a disability as being below both the regional and national average.

Figure 6.7: Households and People with a Long-Term Health Problem or Disability, 2021 – sub-areas – Chelmsford				
	Households Containing Someone with a Health Problem		Population with a Health Problem	
	No.	%	No.	%
Urban	12,140	26.9%	15,424	14.4%
Rural	6,820	28.7%	8,670	14.9%
South Woodham Ferrers	1,682	25.5%	2,097	13.1%
TOTAL	20,642	27.4%	26,191	14.4%

Source: 2021 Census

6.12 As noted, it is likely that the age profile will impact upon the numbers of people with a LTHPD, as older people tend to be more likely to have a LTHPD. The figure below shows the age bands of people with a LTHPD (data from the 2021 Census). It is clear from this analysis that those people in the oldest age bands are more likely to have a LTHPD. The analysis also typically shows lower levels of LTHPD in each age band within Chelmsford when compared with the national and regional position.



Source: 2021 Census

Health Related Population Projections

6.13 The incidence of a range of health conditions is an important component in understanding the potential need for care or support for a growing older population.

- 6.14 The analysis undertaken covers both younger and older age groups and draws on prevalence rates from the PANSI (Projecting Adult Needs and Service Information) and POPPI (Projecting Older People Population Information) websites. Adjustments have been made to take account of the age specific health/disabilities previously shown.
- 6.15 Of particular note are the large increases in the number of older people with dementia (increasing by 52% from 2022 to 2041 and mobility problems (up 44% over the same period). Changes for younger age groups are smaller, reflecting the fact that projections are expecting older age groups to see the greatest proportional increases in population. When related back to the total projected change to the population, the increase of people aged 65+ with a mobility problem represents around 7% of total projected population growth.

Figure 6.9: Projected Changes to Population with a Range of Disabilities – Chelmsford (linked to Standard Method projection)					
Disability	Age Range	2022	2041	Change	% Change
Dementia	65+	2,156	3,283	1,127	52.3%
Mobility problems	65+	5,631	8,116	2,485	44.1%
Autistic Spectrum Disorders	18-64	869	1,006	138	15.9%
	65+	281	383	103	36.6%
Learning Disabilities	15-64	2,276	2,627	351	15.4%
	65+	625	838	213	34.1%
Impaired mobility	16-64	4,905	5,527	621	12.7%

Source: POPPI/PANSI and Demographic Projections

- 6.16 Invariably, there will be a combination of those with disabilities and long-term health problems that continue to live at home with family, those who chose to live independently with the possibility of incorporating adaptations into their homes and those who choose to move into supported housing.
- 6.17 The projected change shown in the number of people with disabilities provides clear evidence justifying delivering ‘accessible and adaptable’ homes as defined in Part M4(2) of Building Regulations, subject to viability and site suitability. The Council should ensure that the viability of doing so is also tested as part of drawing together its evidence base although the cost of meeting this standard is unlikely to have any significant impact on viability and would potentially provide a greater number of homes that will allow households to remain in the same property for longer.

Need for Specialist Accommodation for Older People

- 6.18 Given the ageing population and higher levels of disability and health problems amongst older people, there is likely to be an increased requirement for specialist housing options moving forward. The box below shows the different types of older persons housing which are considered.

Definitions of Different Types of Older Persons' Accommodation

Age-restricted general market housing: This type of housing is generally for people aged 55 and over and the active elderly. It may include some shared amenities such as communal gardens, but does not include support or care services.

Retirement living or sheltered housing (housing with support): This usually consists of purpose-built flats or bungalows with limited communal facilities such as a lounge, laundry room and guest room. It does not generally provide care services, but provides some support to enable residents to live independently. This can include 24-hour on-site assistance (alarm) and a warden or house manager.

Extra care housing or housing-with-care (housing with care): This usually consists of purpose-built or adapted flats or bungalows with a medium to high level of care available if required, through an onsite care agency registered through the Care Quality Commission (CQC). Residents are able to live independently with 24-hour access to support services and staff, and meals are also available. There are often extensive communal areas, such as space to socialise or a wellbeing centre. In some cases, these developments are known as retirement communities or villages - the intention is for residents to benefit from varying levels of care as time progresses.

Residential care homes and nursing homes (care bedspaces): These have individual rooms within a residential building and provide a high level of care meeting all activities of daily living. They do not usually include support services for independent living. This type of housing can also include dementia care homes.

Source: Planning Practice Guidance [63-010]

- 6.19 The need for specialist housing for older persons is typically modelled by applying prevalence rates to current and projected population changes and considering the level of existing supply. There is no standard methodology for assessing the housing and care needs of older people. The current and future demand for elderly care is influenced by a host of factors including the balance between demand and supply in any given area and social, political, regulatory and financial issues. Additionally, the extent to which new homes are built to accessible and adaptable standards may over time have an impact on specialist demand (given that older people often want to remain at home rather than move to care) – this will need to be monitored.
- 6.20 There are a number of 'models' for considering older persons' needs, but they all essentially work in the same way. The model results are however particularly sensitive to the prevalence rates applied, which are typically calculated as a proportion of people aged over 75 who could be expected to live in different forms of specialist housing. Whilst the population aged 75 and over is used in the modelling, the estimates of need would include people of all ages.
- 6.21 Whilst there are no definitive rates, the PPG [63-004] notes that '*the future need for specialist accommodation for older people broken down by tenure and type (e.g. sheltered housing, extra care) may need to be assessed and can be obtained from a number of online tool kits provided by the sector, for example SHOP@ for Older People Analysis Tool*'. The PPG does not specifically mention any other tools and therefore seems to be indicating that SHOP@ would be a good starting point for analysis. Since the PPG was published the Housing Learning and Information Network (Housing LIN) has removed the Shop@ online toolkit although the base rates used for analysis are known.

- 6.22 The SHOP@ tool was originally based on data in a 2008 report (More Choice Greater Voice) and in 2011 a further suggested set of rates was published (rates which were repeated in a 2012 publications). In 2016, Housing LIN published a review document which noted that the 2008 rates are 'outdated' but also noting that the rates from 2011/12 were 'not substantiated'. The 2016 review document therefore set out a series of proposals for new rates to be taken forward onto the Housing LIN website.
- 6.23 Whilst the 2016 review rates do not appear to have ever led to an update of the website, it does appear from reviewing work by Housing LIN over the past couple of years as if it is these rates which typically inform their own analysis (subject to evidence based localised adjustments).
- 6.24 For clarity, the table below shows the base prevalence rates set out in the various documents described above. For the analysis in this report the age-restricted and retirement/sheltered have been merged into a single category (housing with support).

Figure 6.10: Range of suggested baseline prevalence rates from a number of tools and publications

Type/Rate	SHOP@ (2008) ⁴	Housing in Later Life (2012) ⁵	2016 Housing LIN Review
Age-restricted general market housing	-	-	25
Retirement living or sheltered housing (housing with support)	125	180	100
Extra care housing or housing-with-care (housing with care)	45	65	30-40 (‘proactive range’)
Residential care homes	65	(no figure apart from 6 for dementia)	40
Nursing homes (care bedspaces), including dementia	45		45

Source: Range of sources as identified

⁴ Based on the More Choice Greater Voice publication of 2008 (https://www.housinglin.org.uk/_assets/Resources/Housing/Support_materials/Reports/MCGVdocument.pdf). It should be noted that although these rates are from 2008, they are the same rates as were being used in the online toolkit when it was taken offline in 2019.

⁵ https://www.housinglin.org.uk/_assets/Resources/Housing/Support_materials/Toolkit/Housing_in_Later_Life_Toolkit.pdf

- 6.25 In interpreting the different potential prevalence rates it is clear that:
- The prevalence rates used should be considered and assessed taking account of an authority's strategy for delivering specialist housing for older people. The degree for instance which the Council want to require extra care housing as an alternative to residential care provision would influence the relative balance of need between these two housing types;
 - The Housing LIN model has been influenced by existing levels of provision and their view on what future level of provision might be reasonable taking account of how the market is developing, funding availability etc. It is more focused towards publicly commissioned provision. There is a degree to which the model and assumptions within it may not fully capture the growing recent private sector interest and involvement in the sector, particularly in extra care; and
 - The assumptions in these studies look at the situation nationally. At a more local level, the relative health of an area's population is likely to influence the need for specialist housing with better levels of health likely to mean residents are able to stay in their own homes for longer.
- 6.26 JGC have therefore sought to consider these issues and the appropriate modelling assumptions for assessing future needs. Nationally, there has been a clear focus on strengthening a community-led approach and reducing reliance on residential and nursing care – in particular focussing where possible on providing households with care in their own home. This could however be provision of care within general needs housing; but also care which is provided in a housing with care development such as in extra care housing.
- 6.27 We consider that the prevalence rates shown in the 2016 Housing LIN Review is an appropriate starting point; but that the corollary of lower care home provision should be a greater focus on delivery of housing with care. Having regard to market growth in this sector in recent years, and since the above studies were prepared, we consider that the starting point for housing with care should be the higher rate shown in the SHOP@ report (this is the figure that would align with the PPG).
- 6.28 Rather than simply taking the base prevalence rates, an initial adjustment has been made to reflect the relative health of the local older person population. This has been based on Census data about the proportion of the population aged 75 and over who have a long-term health problem or disability (LTHPD) compared with the England average. In Chelmsford, the data shows better health in the older person population and so the prevalence rates used have been decreased slightly (by an average of about 13%) – these figures are based on comparing the proportion of people aged 75 and over with a LTHPD in Chelmsford (38.2%) with the equivalent figure for England (43.9%).
- 6.29 A second local adjustment has been to estimate a tenure split for the housing with support and housing with care categories. This again draws on suggestions in the 2016 Review which suggests that less deprived local authorities could expect a higher proportion of their specialist housing to be in the market sector. Using 2019 Index of Multiple Deprivation (IMD) data, the analysis suggests Chelmsford is the 260th most deprived local authority in England (out of 317) – i.e. a lower than average level of deprivation – this suggests a greater proportion of market housing than a local authority in the middle of the range (for housing with support and housing with care).

- 6.30 The table below shows estimated needs for different types of housing linked to the population projections. The analysis is separated into the various different types and tenures although it should be recognised that there could be some overlap between categories (i.e. some households might be suited to more than one type of accommodation). The table includes estimates of the current supply of different types of accommodation, this information draws on data from the Elderly Accommodation Counsel (EAC) supplemented by data from the Council.
- 6.31 Overall, the analysis suggests that there will be a need for housing with support in the market sector and housing with care (about 70% for market housing). The analysis also suggests a need for some additional residential and nursing care bedspaces.

Figure 6.11: Specialist Housing Need using adjusted SHOP@Review Assumptions, 2022-41 – Chelmsford (linked to Standard Method projection)

		Housing demand per 1,000 75+	Current supply	Current demand	Current shortfall/surplus (-ve)	Additional demand to 2041	Shortfall/surplus by 2041
Housing with support	Market	63	828	1,133	305	508	814
	Affordable	46	1,237	826	-411	370	-41
Total (housing with support)		109	2,196	1,959	-106	878	772
Housing with care	Market	28	189	499	310	224	533
	Affordable	11	85	207	122	93	214
Total (housing with care)		39	143	705	431	316	747
Residential care bedspaces		35	439	627	188	281	469
Nursing care bedspaces		39	604	705	101	316	417
Total bedspaces		74	1,009	1,332	289	597	886

Source: Derived from Demographic Projections and Housing LIN/EAC

- 6.32 It can be seen by 2041 there is an estimated need for 1,520 additional dwellings with support or care across the whole City Council area. In addition, there is a need for 886 additional nursing and residential care bedspaces. Typically for bedspaces it is conventional to convert to dwellings using a standard multiplier (1.80 bedspaces per dwelling for older persons accommodation) and this would therefore equate to around 492 dwellings. In total, the older persons analysis therefore points towards a need for around 2,012 units over the 2022-41 period (106 per annum). Much of this is due to the suggestion there is a current 'backlog' of need and if looking at just the projection, a lower need is shown – 1,526 dwellings (80 per annum).
- 6.33 The provision of a choice of attractive housing options to older households is a component of achieving good housing mix. The availability of such housing options for the growing older population may enable some older households to downsize from homes which no longer meet their housing needs or are expensive to run. The availability of housing options which are accessible to older people will also provide the opportunity for older households to 'rightsize' which can help improve their quality of life.

- 6.34 It should also be noted that within any category of need there may be a range of products. For example, many recent market extra-care schemes have tended to be focused towards the ‘top-end’ of the market and may have significant service charges (due to the level and quality of facilities and services). Such homes may therefore only be affordable to a small proportion of the potential market, and it will be important for the Council to seek a range of products that will be accessible to a wider number of households if needs are to be met.

Wheelchair User Housing

- 6.35 The analysis below draws on secondary data sources to estimate the number of current and future wheelchair users and to estimate the number of wheelchair accessible/adaptable dwellings that might be required in the future. Estimates of need produced in this report draw on data from the English Housing Survey (EHS) – mainly 2018/19 data. The EHS data used includes the age structure of wheelchair users, information about work needed to homes to make them ‘visitable’ for wheelchair users and data about wheelchair users by tenure.
- 6.36 The table below shows at a national level the proportion of wheelchair user households by the age of household reference person. Nationally, around 3.4% of households contain a wheelchair user – with around 1% using a wheelchair indoors. There is a clear correlation between the age of household reference person and the likelihood of there being a wheelchair user in the household.

Figure 6.12: Proportion of wheelchair user households by age of household reference person – England

Age of household reference person	No household members use a wheelchair	Uses wheelchair all the time	Uses wheelchair indoors only	Uses wheelchair outdoors only	TOTAL
24 and under	99.4%	0.3%	0.0%	0.3%	100.0%
25-34	99.3%	0.3%	0.1%	0.2%	100.0%
35-49	98.2%	0.5%	0.1%	1.2%	100.0%
50-64	96.9%	0.7%	0.4%	2.0%	100.0%
65 and over	93.1%	0.9%	0.4%	5.6%	100.0%
All households	96.6%	0.6%	0.3%	2.5%	100.0%

Source: English Housing Survey (2018/19)

- 6.37 The prevalence rate data can be brought together with information about the household age structure and how this is likely to change moving forward – adjustments have also been made to take account of the relative health (by age) of the population). The data estimates a total of 1,928 wheelchair user households in 2022, and that this will rise to 2,503 by 2041.

Age of HRP	Prevalence rate (% of households)	Households 2022	Households 2041	Wheelchair user households (2022)	Wheelchair user households (2041)
24 and under	0.7%	1,340	2,051	9	14
25-34	0.6%	8,931	11,524	49	64
35-49	1.2%	21,045	24,046	246	281
50-64	1.9%	21,900	24,010	418	458
65 and over	5.2%	23,070	32,271	1,205	1,685
All households	-	76,285	93,901	1,928	2,503

Source: Derived from a range of sources

- 6.38 The finding of an estimated current number of wheelchair user households does not indicate how many homes might be need for this group – some households will be living in a home that is suitable for wheelchair use, whilst others may need improvements to accommodation, or a move to an alternative home. Data from the EHS (2014-15) shows that of the 814,000 wheelchair user households, some 200,000 live in a home that would either be problematic or not feasible to make fully 'visitable' – this is around 25% of wheelchair user households.
- 6.39 Applying this to the current number of wheelchair user households and adding the additional number projected forward suggests a need for around 1,057 additional wheelchair user homes in the 2022-41 period. If the projected need is also discounted to 25% of the total (on the basis that many additional wheelchair user households will already be in accommodation) leads to a need estimate of 626 homes. These figures equate to a need for 33-57 dwellings per annum. If the estimate of current need is excluded (so as to just look at future changes) the need drops to just 8-30 dwellings per annum.

	Current need	Projected need (2022-41)	Total current and future need
Total	482	575	1,057
@ 25% of projected	482	144	626

Source: Derived from a range of sources

- 6.40 Furthermore, information in the EHS (for 2018/19) also provides national data about wheelchair users by tenure. This showed that, at that time, around 7.1% of social tenants were wheelchair users (including 2.2% using a wheelchair indoors), compared with 3.1% of owner-occupiers (0.7% indoors). These proportions can be expected to increase with an ageing population but do highlight the likely need for a greater proportion of social (affordable) homes to be for wheelchair users.

Figure 6.15: Proportion of wheelchair user households by tenure of household reference person – England					
	No household members use a wheelchair	Uses wheelchair all the time	Uses wheelchair indoors only	Uses wheelchair outdoors only	TOTAL
Owners	96.9%	0.5%	0.2%	2.4%	100.0%
Social sector	92.9%	1.6%	0.6%	4.8%	100.0%
Private renters	98.8%	0.1%	0.1%	0.9%	100.0%
All households	96.6%	0.6%	0.3%	2.5%	100.0%

Source: English Housing Survey (2018/19)

- 6.41 To meet the identified need, the Council could seek a proportion (maybe up to 5%) of all new market homes to be M4(3) compliant and potentially a higher figure in the affordable sector (say 10%). These figures reflect that not all sites would be able to deliver homes of this type. In the market sector these homes would be M4(3)A (adaptable) and M4(3)B (accessible) for affordable housing.
- 6.42 As with M4(2) homes it may not be possible for some schemes to be built to these higher standards due to built-form, topography, flooding etc. Furthermore, provision of this type of property may in some cases challenge the viability of delivery given the reasonably high build out costs (see table below).
- 6.43 It is worth noting that the Government has recently reported on a consultation on changes to the way the needs of people with disabilities and wheelchair users are planned for as a result of concerns that in the drive to achieve housing numbers, the delivery of housing that suits the needs of the households (in particular those with disabilities) is being compromised on viability grounds⁶.
- 6.44 The key outcome is: *‘Government is committed to raising accessibility standards for new homes. We have listened carefully to the feedback on the options set out in the consultation and the government response sets out our plans to mandate the current M4(2) requirement in Building Regulations as a minimum standard for all new homes’*. This change is due to shortly be implemented through a change to building regulations.
- 6.45 The consultation outcome still requires a need for M4(3) dwellings to be evidenced, stating *‘M4(3) (Category 3: Wheelchair user dwellings) would continue as now where there is a local planning policy in place in which a need has been identified and evidenced. Local authorities will need to continue to tailor the supply of wheelchair user dwellings to local demand’*.
- 6.46 It should be noted that local authorities only have the right to request M4(3)(B) accessible compliance from homes for which they have nomination rights. They can, however, request M4(3)(A) adaptable compliance from the wider (market) housing stock.

⁶ <https://www.gov.uk/government/consultations/raising-accessibility-standards-for-new-homes>

- 6.47 A further option for the Council would be to consider seeking a higher contribution, where it is viable to do so, from those homes to which they have nomination rights. This would address any under delivery from other schemes (including schemes due to their size e.g. less than 10 units or 1,000 square metres) but also recognise the fact that there is a higher prevalence for wheelchair use within social rent tenures. This should be considered when setting policy.

Older and Disabled People: Key Messages

- A range of data sources and statistics have been accessed to consider the characteristics and housing needs of the older person population and the population with some form of disability. The two groups are taken together as there is a clear link between age and disability. The analysis responds to Planning Practice Guidance on Housing for Older and Disabled People published by Government in June 2019 and includes an assessment of the need for specialist accommodation for older people and the potential requirements for housing to be built to M4(2) and M4(3) housing technical standards (accessibility and wheelchair standards)
- The data shows that Chelmsford has a similar age structure to other areas in terms of the proportion of older people. The older person population shows high proportions of owner-occupation, and particularly outright owners who may have significant equity in their homes (79% of all older person households are outright owners).
- The older person population is projected to increase notably moving forward. An ageing population means that the number of people with disabilities is likely to increase substantially. Key findings for the 2022-41 period include:
 - a 35% increase in the population aged 65+ (potentially accounting for 36% of total population growth);
 - a 52% increase in the number of people aged 65+ with dementia and a 44% increase in those aged 65+ with mobility problems;
 - a need for around 770 housing units with support (sheltered/retirement housing) – all within the market sector;
 - a need for around 750 additional housing units with care (e.g. extra-care) – the majority (around 70%) in the market sector;
 - a need for additional residential and nursing care bedspaces (around 890 in the period); and
 - a need for up to 1,060 dwellings to be for wheelchair users (meeting technical standard M4(3)).
- This would suggest that there is a clear need to increase the supply of accessible and adaptable dwellings and wheelchair user dwellings as well as providing specific provision of older persons housing. Given the evidence, the Council could consider (as a start point) requiring all dwellings (in all tenures) to meet the M4(2) standards and around 5% of homes meeting M4(3) – wheelchair user dwellings in the market sector (a higher proportion of around 10% in the affordable sector).
- Where the authority has nomination rights M4(3) would be wheelchair accessible dwellings (constructed for immediate occupation) and in the market sector they should be wheelchair user adaptable dwellings (constructed to be adjustable for occupation by a wheelchair user). It should however be noted that there will be cases where this may not be possible (e.g. due to viability or site-specific circumstances) and so any policy should be applied flexibly.

7. Private Rented Sector

Introduction

- 7.1 Planning Practice Guidance on housing needs of different groups highlights the Private Rented Sector (PRS) as one of the specific groups that should be analysed, although there is little advice on the analysis expected and the outputs. Specifically, the PPG says: *'tenure data from the Office for National Statistics can be used to understand the future need for private rented sector housing'* and *'the level of changes in rents may reflect the demand in the area for private rented sector housing'*.
- 7.2 This section therefore looks at a range of statistics in relation to the PRS in Chelmsford. Where reasonable, comparisons are made with other tenures (i.e. owner-occupied and social rented) as well as contrasting data with other areas. The aim is to bring together a range of information to understand the role played by the sector, and to consider if there is any need to provide additional housing in this tenure.
- 7.3 The section also includes a discussion of Build-to-Rent (BtR) housing which is another component of the PRS market. As the name suggests this is purpose built accommodation that is designed for rent and is a tenure now specifically included in the NPPF (along with a related PPG⁷). Currently there are no BtR schemes in Chelmsford but there has been developer interest in this tenure over the past year or so.

Size of the Private Rented Sector

- 7.4 The table below shows the tenure split of housing in 2021 in Chelmsford and a range of other areas. This shows a total of 11,700 households living in private rented housing in the City Council area – 15.5% of all households. This proportion is similar to the County average, and below regional and national equivalent figures. The vast majority of households in the PRS are living in housing rented from a landlord or through a letting agency, although around 1,245 (1.7% of all households) are recorded as living in 'other' PRS accommodation, this is likely to be mainly households living in housing owned by a relative or friend.

	Chelmsford	Essex	East of England	England
Owns outright	27,057	227,592	910,112	7,624,693
Owns with mortgage/loan	26,570	210,037	830,690	6,980,323
Social rented	10,017	88,529	407,152	4,005,663
Private rented	11,724	99,764	478,574	4,794,889
Living rent free	33	548	2,254	30,517
Total	75,401	626,470	2,628,782	23,436,085
% private rented	15.5%	15.9%	18.2%	20.5%

Source: Census (2021)

⁷ <https://www.gov.uk/guidance/build-to-rent>

- 7.5 As well as looking at the current tenure profile, it is of interest to consider how this has changed over time; the table below shows (for the whole of the City Council area) data from the 2011 and 2021 Census. From this it is clear that there has been significant growth in the number of households living in privately rented accommodation as well as an increase in outright owners (this will be due to mortgages being paid off, which may have been assisted by a period of low interest rates). There has been a decline in the number of owners with a mortgage and an increase in the number of households in social rented accommodation. The apparent large drop in people 'living rent free' is likely to largely be due to an improvement in the Census where previously it was likely that some households who were receiving full housing benefit recorded themselves as being rent free.

	2011 households	2021 households	Change	% change
Owens outright	23,696	27,057	3,361	14.2%
Owens with mortgage/loan	27,732	26,570	-1,162	-4.2%
Social rented	9,120	10,017	897	9.8%
Private rented	8,349	11,724	3,375	40.4%
Other	770	33	-737	-95.7%
Total	69,667	75,401	5,734	8.2%

Source: 2011 and 2021 Census

- 7.6 The general pattern of tenure changes in Chelmsford is broadly similar to that seen in other areas – i.e. an increase in the PRS and outright owners and a reduction in owners with a mortgage. However, the proportionate increase in the number of households in the PRS is more notable in the City Council area than other locations; nationally, over the 10-year period the PRS grew by 29%, but by 40% in Chelmsford.

	Chelmsford	Essex	East of England	England
Owens outright	14.2%	12.9%	14.2%	13.0%
Owens with mortgage/loan	-4.2%	-3.0%	-3.3%	-5.7%
Social rented	9.8%	6.1%	7.1%	2.6%
Private rented	40.4%	35.4%	34.3%	29.0%
Other	-95.7%	-91.4%	-92.7%	-89.7%
TOTAL	8.2%	7.7%	8.5%	6.2%

Source: 2011 and 2021 Census

- 7.7 The data above shows information for all households and it is of interest to study this information by age with the table below showing the strongest change to have been in the 35-49 age group (increasing by 1,350 households) – in proportionate terms the number of households aged 50-64 has increased by 82%. The growth in younger households has by comparison been quite modest. It should be noted that the total change shown in this table is lower than shown in tables above, this is due to the private rented data also including households living 'rent free'.

Figure 7.4: Change in age of households in private rented sector (2011-21) – Chelmsford				
	2011	2021	Change	% change
Under 25	853	680	-173	-20.3%
25-34	3,142	3,498	356	11.3%
35-49	3,061	4,414	1,353	44.2%
50-64	1,241	2,254	1,013	81.6%
65+	822	909	87	10.6%
TOTAL	9,119	11,755	2,636	28.9%

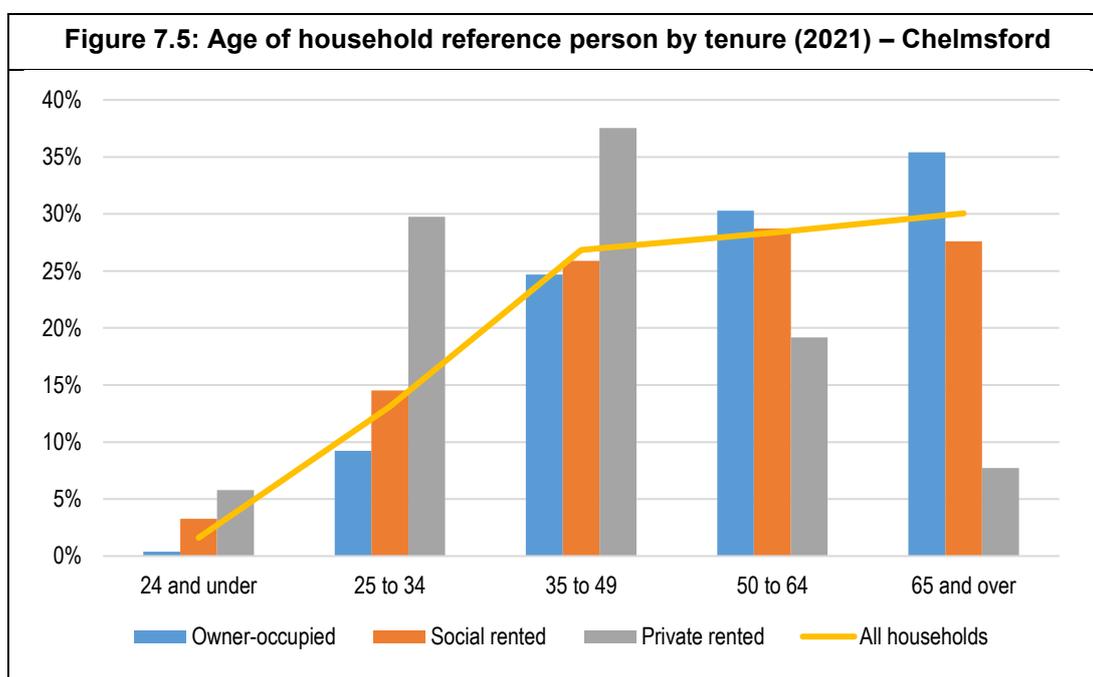
Source: 2011 and 2021 Census

Profile of Private Renters

7.8 This section presents a profile of people/households living in the private rented sector. Whenever possible comparisons are made with those living in other tenures.

Age

7.9 Private renters are younger than social renters and owner occupiers. In 2021, the average age of household reference persons (HRPs) in the private rented sector was 43 years (compared with 57 years for owner occupiers and 53 for social renters). Nearly three-quarters (73%) of private rented sector HRPs were aged under 50 compared with 44% of social renters and 34% of owner occupiers.



Source: Census (2021)

Household type

- 7.10 The table below shows the composition of households living in the private rented sector (and compared with other tenures). This shows a particularly high proportion of households with dependent children, making up 34% of the PRS and younger single person households (26% of the sector). The sector also sees a relatively high proportion of households in the ‘other’ category. Many of these households are likely to be multi-adult households living in shared accommodation (i.e. houses in multiple occupation (HMOs)).
- 7.11 Between 2011 and 2021, Census data shows that the number of households with dependent children in the PRS rose from 2,732 to 3,964 – a 45% increase. The proportion of the PRS made up of households with dependent children has increased from 30% to 34% over the same period. The EHS also shows a similar pattern nationally.

Figure 7.6: Household composition by tenure (2011) – Chelmsford				
	Owner-occupied	Social rented	Private rented	Total
Single person aged 66+	13.5%	18.0%	4.4%	12.7%
Single person aged <66	11.3%	24.2%	26.1%	15.4%
Couple aged 66+	14.0%	4.2%	1.2%	10.7%
Couple, no children	18.6%	7.0%	20.6%	17.4%
Couple, dependent children	23.7%	12.5%	21.2%	21.8%
Couple, all children non-dependent	8.4%	4.7%	2.4%	7.0%
Lone parent, dependent children	2.6%	17.5%	10.0%	5.7%
Lone parent, all children non-dependent	3.5%	7.1%	2.9%	3.9%
Other households with dependent children	1.7%	1.7%	2.6%	1.8%
Other households	2.7%	2.9%	8.6%	3.7%
Total	100.0%	100.0%	100.0%	100.0%
Total households	53,629	10,014	11,758	75,401
Total dependent children	27.9%	31.7%	33.7%	29.3%

Source: Census (2021)

Size of accommodation

- 7.12 The table below shows the size of accommodation in the PRS compared with other sectors. From this it is clear that the PRS is strongly focussed on 2- and 3-bedroom homes (making up 66% of all households in this tenure). The owner-occupied sector in contrast is dominated by 3+-bedroom homes (79% of the total in this tenure) whilst social renting has the highest proportion of 1-bedroom homes (36%).

Figure 7.7: Accommodation size by tenure (households) – Chelmsford				
	Owner-occupied	Social rented	Private rented	Total
1-bedroom	4.4%	36.2%	23.2%	11.6%
2-bedrooms	16.7%	32.2%	39.7%	22.4%
3-bedrooms	41.3%	28.6%	26.5%	37.3%
4+-bedrooms	37.5%	3.0%	10.6%	28.7%
Total	100.0%	100.0%	100.0%	100.0%
	53,627	10,018	11,755	75,400

Source: Census (2021)

Overcrowding and under-occupation

- 7.13 The analysis below studies levels of overcrowding and under-occupation – this is based on the bedroom standard with data taken from the 2021 Census. The analysis shows that levels of overcrowding in the PRS are higher than for households generally, with 5.6% of households being overcrowded in 2011 (lower than the 8% figure in social rented accommodation, but notably above the owner-occupied figure of 1%). Levels of under-occupation are slightly higher than in the social rented sector, with around 49% of households having at least one spare bedroom (87% in the owner-occupied sector).

Figure 7.8: Overcrowding and under-occupation by tenure (households) – Chelmsford				
	Owner-occupied	Social rented	Private rented	Total
+2 or more	54.4%	8.3%	13.4%	41.9%
+1	32.2%	20.0%	35.3%	31.1%
0	12.3%	63.6%	45.6%	24.3%
-1 or fewer	1.0%	8.0%	5.6%	2.7%
Total	100.0%	100.0%	100.0%	100.0%
	53,628	10,019	11,757	75,404

Source: Census (2021)

Economic activity

- 7.14 Data from the 2021 Census shows that 84% of private renters in Chelmsford were working, this is higher than the proportion of owner occupiers (65%) and somewhat higher than the proportion of social renters in work (5%). Smaller proportions of private renters were retired (6%) compared with nearly a third (32%) of owner-occupiers and around a quarter (24%) of social rented sector tenants.

	Owner-occupied	Social rented	Private rented	Total
In employment	65.1%	44.5%	83.6%	65.3%
Unemployed	0.7%	4.3%	2.9%	1.5%
Retired	32.1%	24.0%	5.7%	26.9%
Looking after home or family	0.6%	7.8%	2.3%	1.8%
Long-term sick or disabled	0.6%	13.5%	2.0%	2.5%
Other	0.9%	5.8%	3.5%	2.0%
Total	100.0%	100.0%	100.0%	100.0%
	53,624	10,017	11,755	75,396

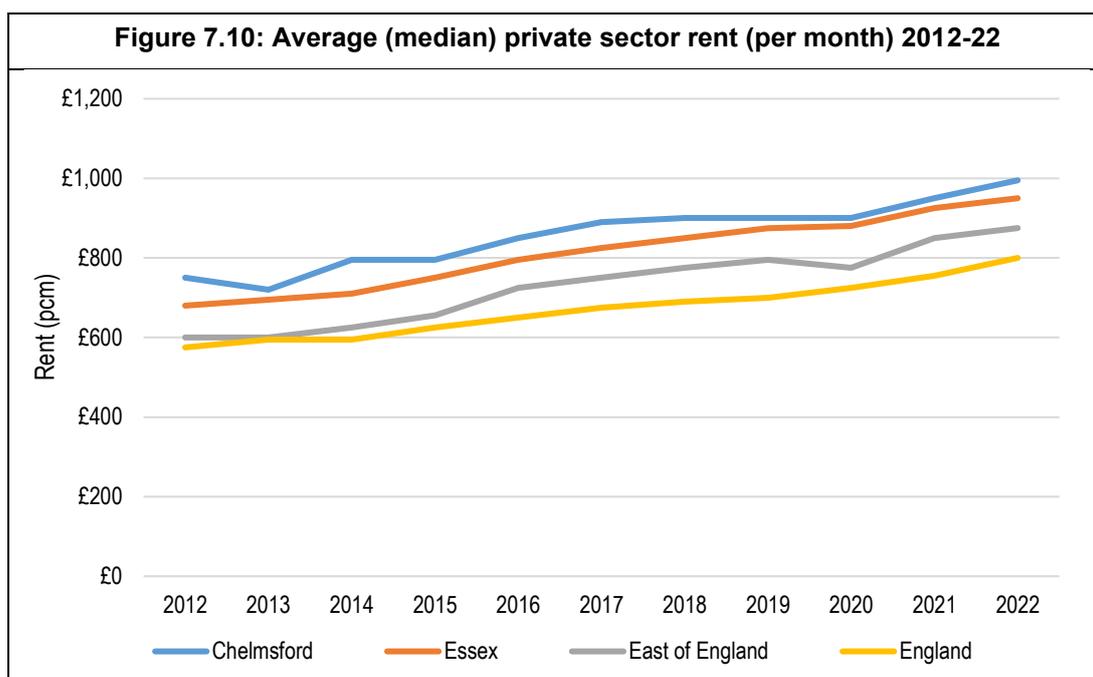
Source: Census (2021)

Quality of accommodation

- 7.15 There is no specific secondary data source about the quality of private rented accommodation in Chelmsford. However, at a national level (from the English Housing Survey (EHS)) it is clear that the private rented sector is typically of lower quality but with higher rents (and rents that are not regulated in the same way as for social housing).
- 7.16 As of 2021, the EHS recorded 22.9% of PRS homes as being 'non-decent', this was more than double the rate for social rented homes (9.6%); energy efficiency was also found to be somewhat lower in the PRS. The EHS also shows that private renters reported higher rental costs than social renters, spending on average (median) £173 per week in rent compared with £97 for social renters.

Housing Costs

- 7.17 The analysis of affordable housing need describes the current cost of housing in the PRS in Chelmsford. Below, analysis is carried out to look at how costs have changed over time. This draws on data from the Valuation Office Agency (VOA) and ONS using a time series back to 2012 – the data provided in this section looks at the year to the end of September (for any given year). The figure below shows a time-series of average (median) rents from 2012 to 2022; this shows across the City Council area that there has been an increase in rent levels, with rents being consistently above those seen in other areas.



Source: VOA and ONS

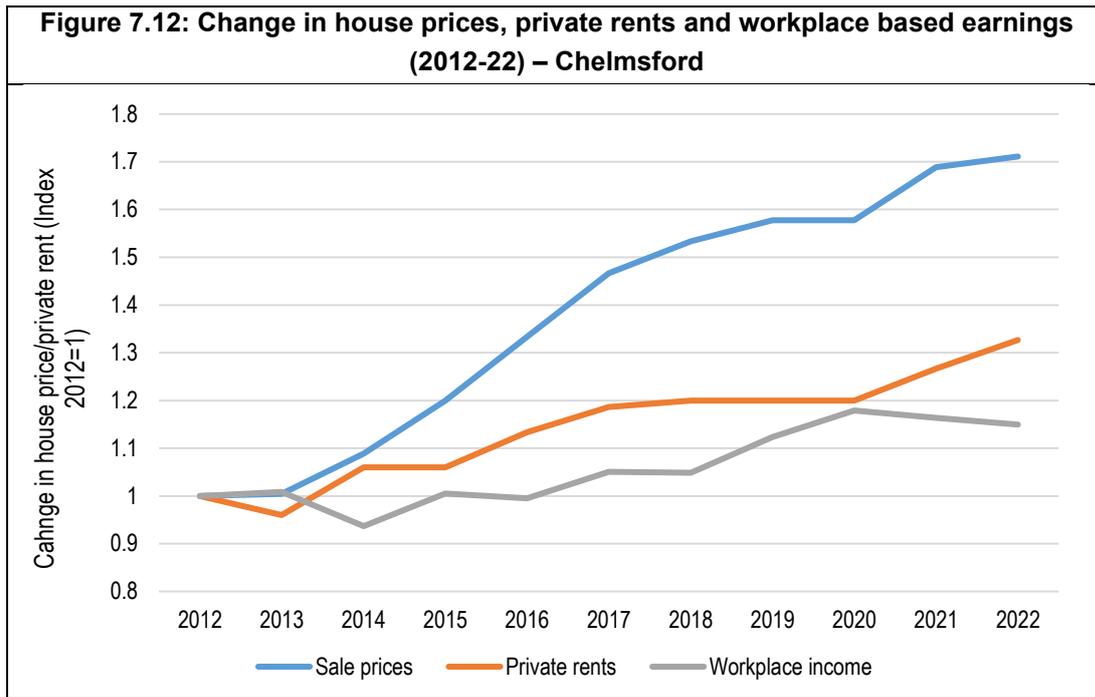
- 7.18 The table below shows that the overall average rent in Chelmsford increased by £245 per month (a 33% increase) in the decade to 2022, with higher increases seen for 1- and 3-bedroom homes. In comparison, rents increased by 40% across Essex, 46% in the East of England region and 39% nationally.

Figure 7.11: Average (median) private sector rent (per month) 2012 and 2022 – Chelmsford

	2012	202	Change	% change
1-bedroom	£575	£850	£275	48%
2-bedrooms	£758	£1,000	£242	32%
3-bedrooms	£895	£1,250	£355	40%
4+-bedrooms	£1,350	£1,695	£345	26%
All dwellings	£750	£995	£245	33%

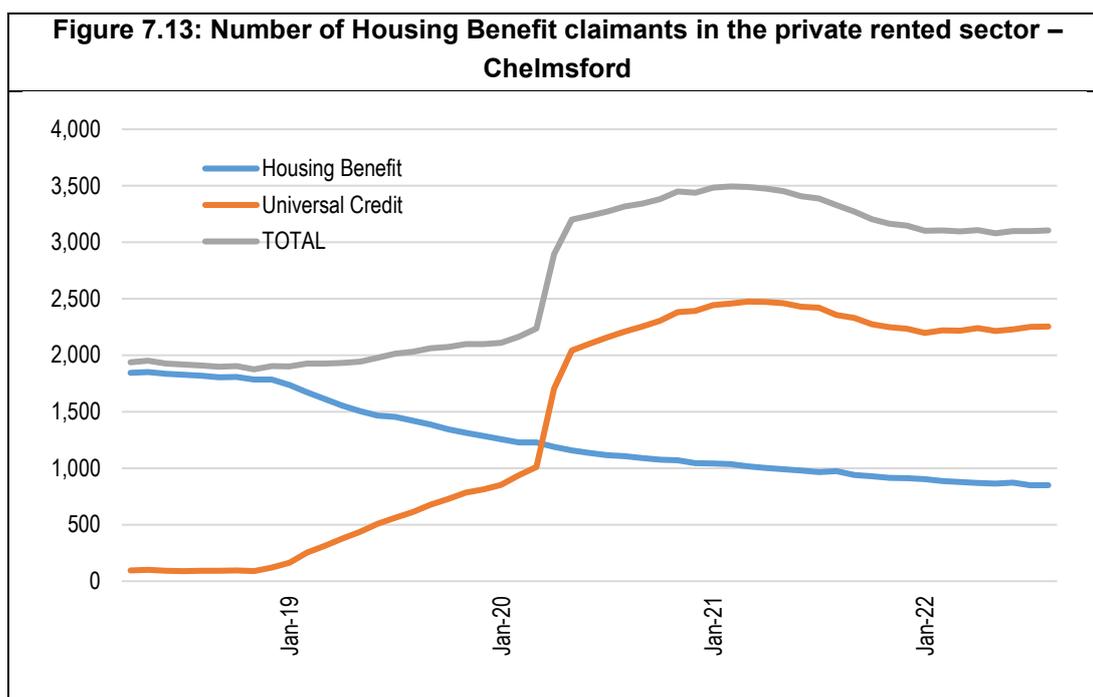
Source: VOA and ONS

- 7.19 The figure below shows a comparison between changes to private sector rents and changes to the average house price in the 2012-22 period – the chart also shows workplace based earnings (as used in the Standard Method). The analysis shows that house prices have increased by around 70% in Chelmsford, compared with a 33% change in rents respectively. Both of these increases are in excess of the growth in earnings over the same period. This analysis arguably points to a shortage of private rented accommodation but less so when compared with the owner-occupied sector.



Housing Benefit Claimants

- 7.20 A further analysis has been carried out to look at the number of housing benefit claimants in the sector. This provides an indication of the number of people who are using the sector as a form of affordable housing, and in many cases will be living in private rented accommodation due to a lack to affordable housing (e.g. in the social rented sector). It should however be noted that some of these households may also be in the sector through choice.
- 7.21 Data from the Department of Work and Pensions (DWP) has been used to look at the number of Housing Benefit supported private rented homes. As of August 2022, it is estimated that there were around 3,100 benefit claimants in the private rented sector in Chelmsford. From this, it is clear that the PRS contributes to the wider delivery of ‘affordable homes’ with the support of benefit claims.
- 7.22 The figure below shows the trend in the number of claimants in the City Council area. This shows there has been a notable increase since March 2020, which is likely to be related to the Covid-19 pandemic. However, even the more historical data shows a substantial number of households claiming benefit support for their housing in the private sector (typically around 2,000 households).



Source: Department of Work and Pensions

Build-to-Rent

- 7.23 Build to Rent (BtR) is another component of the PRS market. As the name suggests this is purpose built accommodation that is designed for rent, not sale and is typically (but not exclusively) in the form of large scale apartment schemes under single management. There are currently no BtR schemes in Chelmsford but there has been developer interest. This section therefore initially provides some background information about this tenure.
- 7.24 In the context of the significant growth in the PRS sector over the last 20+ years and a national housing shortage, successive Governments have looked to the PRS to play a greater role in providing more new build housing and have sought to encourage “Build to Rent” development . At paragraph 3.23 the Housing White Paper⁸ in 2017 states that the Government’s key proposal were to:

“change the National Planning Policy Framework so authorities know they should plan proactively for Build to Rent where there is a need, and to make it easier for Build to Rent developers to offer affordable private rental homes instead of other types of affordable housing;

• ensure that family-friendly tenancies of three or more years are available for those tenants that want them on schemes that benefit from our changes. We are working with the British Property Federation and National Housing Federation to consolidate this approach across the sector.”

8

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/590464/Fixing_our_broken_housing_market_-_print_ready_version.pdf

- 7.25 This resulted in specific guidance and changes to the NPPF to include the addition of affordable private rent as a distinct tenure and changes to the definition of affordable housing to include this within it as well as a build to rent definition:

“Purpose built housing that is typically 100% rented out. It can form part of a wider multi-tenure development comprising either flats or houses, but should be on the same site and/or contiguous with the main development. Schemes will usually offer longer tenancy agreements of three years or more, and will typically be professionally managed stock in single ownership and management control.”

- 7.26 There are a number of sub sectors within the wider purpose built rental sector including ‘Co-Living’ and Purpose Built Student Accommodation (PBSA). This section focusses primarily on Built to Rent (BtR) which is defined by the NPPF as “Purpose built housing that is typically 100% rented out“. This would be self-contained accommodation distinct from Co-living which is generally defined as non-self-contained units with shared communal space and amenities (e.g. shared kitchen and dining facilities).

Build-to-Rent – The Policy Context

- 7.27 In respect of Build to Rent, the Housing White Paper (February 2017) was clear in 2017 that the Government wanted to build on earlier initiatives to attract new investment into large-scale housing which is purpose-built for market rent (i.e. Build to Rent).
- 7.28 At that time, the Government set out that this would drive up overall housing supply, increase choice and standards for people living in privately rented homes and provide more stable rented accommodation for families – particularly as access to ownership has become more challenging.
- 7.29 This was realised through the publication of the revised NPPF (February 2019) which recognises the emergence of purpose-built private rented accommodation as a distinct sector of the housing market.
- 7.30 The NPPF (paragraph 61) also says the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies including those people who rent their homes (as separate from those in affordable housing need).
- 7.31 The Build to Rent Planning Practice Guidance⁹ states that *“If a need is identified, authorities should include a plan policy setting out their approach to promoting and accommodating build to rent. This should recognise the circumstances and locations where build to rent developments will be encouraged – for example as part of large sites and/or a town-centre regeneration area.”* (Paragraph: 001 Reference ID: 60-001-20180913).

⁹ <https://www.gov.uk/guidance/build-to-rent>

- 7.32 The PPG also provide Guidance as to how Local Authorities can ensure “Family Friendly” tenancy of three years or more. “In granting planning permission for build to rent developments, authorities should set in place a planning condition requiring scheme operators to offer tenancies of 3 or more years to all tenants in the development, who are eligible to live in the country for that period (under the right to rent). This should apply to all tenants, whether paying market rent or affordable private rent.” (Paragraph: 010 Reference ID: 60-010-20180913).
- 7.33 It also adds that there is no obligation on customers to take up that option if they prefer a shorter term contract and can give notice to terminate the contract at any point. It also adds that any rent or service charge reviews should be in line with an agreed percentage or linked to inflation.
- 7.34 In relation to minimum standards the PPG states that *“Individual schemes should meet any relevant local and national planning policy requirements. Affordable private rental homes within any particular scheme should be constructed and managed to the same high quality standards as the market private rental homes. There are no extra national standards in addition to this”*. (Paragraph: 011 Reference ID: 60-011-20180913).
- 7.35 It also notes that there is *“no national requirement for authorities to apply national space standards in their area”* and *“Where authorities choose to apply them the national policy does not preclude authorities from dis-applying them for particular parts of the local plan area, or for particular development types, such as build to rent schemes.”* (Paragraph: 011 Reference ID: 60-011-20180913).
- 7.36 Neither the NPPF, Planning Practice Guidance or local policy specifically relate to Co-living. Although a number of local authorities have addressed this issue including the Greater London Authority (GLA).

Benefits of Build-to-Rent

- 7.37 The potential benefits of Build to Rent are best summarised in the Government’s A Build to Rent Guide for Local Authorities which was published in March 2015. The Guide notes the benefits are wide ranging but can include:
- Helping local authorities to meet demand for private rented housing whilst increasing tenants’ choice “as generally speaking tenants only have the option to rent from a small-scale landlord”.
 - Retaining tenants for longer and maximising occupancy levels as Build to Rent investment is an income focused business model;
 - Helping to increase housing supply, particularly on large, multiple phased sites as it can be built alongside properties built for sale and affordable housing; and
 - Utilising good design and high-quality construction methods which are often key components of the Build to Rent model.
- 7.38 This Build to Rent Guide provides a helpful overview of the role that Build to Rent is intended to play in the housing market, offering opportunities for those who wish to rent privately (i.e. young professionals) and for those on lower incomes who are unable to afford their own home.

- 7.39 Over recent years there has been a rapid growth in the Build to Rent sector backed by domestic and overseas institutional investment. Turning to the present and the latest market insight on Build to Rent as it begins to mature and strengthen as a development sector, the Savills UK Build to Rent Market Update¹⁰ for Q4 2022 states that the market now had 78,700 completed units (up from 50,800 in Q1 2021). There was also an additional 50,500 under construction and 113,400 in the development pipeline, a total of 242,400 units complete or in the pipeline. This is around 42,000 more units than in Q2 2021 and is a significant growth since Q4 2013 when the number was only around 22,000.
- 7.40 Previous editions of the report stated that around 88% of the operational stock was located in City Centre flats but the most recent report states that much of the growth has been in Single Family units with growth seen across an additional 29 local authorities.
- 7.41 This is expected to continue with developers looking at alternative sales strategies including towards BtR management companies in order to de-risk their pipelines. This comes as the number of mortgage offers fall and people are more unable to buy and thus needing to rent.
- 7.42 It is also that case that Buy to Let landlords continue to withdraw from the market at an increasing rate with nationally over 330,000 Buy to Let mortgage redemptions since April 2016. This has reduced the supply of private rented housing.
- 7.43 Research by JLL on the Co-Living market suggested the market was around 3,100 Units in 2021 with pipeline of around 24,000 units. The majority of existing and pipeline development is in London but there are operators outside of London including in Guildford and Brighton.

Profile of Tenants

- 7.44 The British Property Federation (“BPF”), London First and UK Apartment Association (“UKAA”) published a report¹¹ (February 2021) profiling those who live in Build to Rent accommodation in London. This is likely to be reflective of the potential demand in Chelmsford to some degree.
- 7.45 The report shows that around 62% of Build to Rent residents were aged between 25 and 34 compared with 47% in the wider PRS market. The remaining residents included 17% aged between 16 and 24 and 13% aged 35-44, both of which were below the corresponding values for the wider PRS market.
- 7.46 The survey based data identified that incomes are similar to those in PRS accommodation with 43% earning less than £32,000 and 29% earning between £32,000 and £47,000. Typically, Build to Rent residents spend between 29% and 35% of their income of accommodation. This compares to between 29% and 32% in the wider PRS demonstrating a willingness to pay slightly more.
- 7.47 The report noted that Build to Rent has comparable levels of affordability but is notably more affordable for couples and sharers. This is perhaps reflected in the higher incidence of these household types within the Build to Rent sector.

¹⁰ https://www.savills.co.uk/research_articles/229130/330310-0

¹¹ https://buildtorent.files.wordpress.com/2021/01/who-lives-in-build-to-rent-1.pdf?mc_cid=624df5d223&mc_eid=e05cc2220b

- 7.48 The report also identified a broadly similar balance of people working in the public and private sectors with 90.5% of residents employed in the private sector living in Build to Rent accommodation compared with 80% in the PRS. The most common industries included Finance and Insurance (25%), Other Services (20%) and IT and Communications (including marketing) (15%).

Stakeholder Consultation Relevant to the PRS

- 7.49 A full account of the stakeholder consultation can be found in Section 1 of this report and the text below just highlights some of the key findings.
- 7.50 Discussions with letting agents did highlight some concerns with the PRS, in particular it was noted the supply of rented housing was not keeping up with demand because of an unwillingness to invest due to issues such as high purchase prices, changes to the tax system and increased regulation.
- 7.51 Consultation with local employers highlighted that local housing supply is a major barrier to recruitment and retention and that staff particularly faced difficulty in finding good quality private rented sector housing. In interpreting this it should however be noted that the employer consultation was limited to only three companies taking part.

Need for Additional PRS housing (including BtR)

- 7.52 The analysis in this section points to strong demand in the private rented sector, the number of households living in PRS housing has been increasing over time and rent levels are also increasing at a faster rate than incomes (albeit not as rapidly as house prices).
- 7.53 However, this study has not attempted to estimate the need for additional private rented housing. It is likely that the decision of households as to whether to buy or rent a home in the open market is dependent on a number of factors which mean that demand can fluctuate over time; this would include mortgage lending practices and the availability of Housing Benefit. A general (national and local) shortage of housing is likely to have driven some of the growth in the private rented sector, including increases in shared accommodation. If the supply of housing increases, then this potentially means that more households would be able to buy, who would otherwise be renting.
- 7.54 That said, the Council could be supportive of new private rented sector housing (including Built-to-Rent) where this can be seen to be of higher quality and potentially providing a housing offer that does not exist in any great quantity. It has previously been noted that stock condition in the PRS is generally worse than in other sectors and BtR housing could help to improve this situation. In addition, the age of tenants in the sector seems to be getting slightly older, and may contain more households with higher incomes. There may also be a market for essential local (key) workers due to income levels typically sitting between buying and renting a home.
- 7.55 If applications do come forward for BtR schemes, these should be treated on their merits and it is considered that delivering affordable housing on such schemes should be a key consideration. The BtR PPG states that *'20% is generally a suitable benchmark for the level of affordable private rent homes to be provided (and maintained in perpetuity) in any build to rent scheme'*. Given the level of affordable housing need in the City Council area, it is recommended the Council tests (through a viability assessment) whether a higher proportion could be achieved.

7.56 In terms of affordable rent levels on BtR schemes the PPG notes that *'national affordable housing policy also requires a minimum rent discount of 20% for affordable private rent homes relative to local market rents'*. Without knowing what rents will be on any BtR scheme it is difficult to definitively understand if the 20% figure is reasonable. However, research by Dixon Searle for Brighton & Hove Council¹² suggests BtR rents are typically around 20% above market rents (paragraph 3.14) – that being the case it is clear a higher discount would be required to make homes 'genuinely affordable' as 20% would simply take the cost back to market levels. It is recommended the Council caps the affordable rent levels at the relevant Local Housing Allowance rate to ensure affordability.

7.57 It will also be important to consider the mix of homes in BtR. The housing mix section of this report did not specifically look at this sector, however the analysis of affordable home ownership was based on the profile of households living in private rented accommodation and so the conclusions for that tenure will be a reasonable starting point for considering mix. For clarity, these are set out below although it must be stressed these are indicative with the actual mix also likely to be influenced by factors such as the nature of sites which may point towards a particular built-form/size of accommodation as being appropriate:

- 1-bedroom – 25%
- 2-bedrooms – 45%
- 3-bedrooms – 25%
- 4+-bedrooms – 5%

7.58 The mix points towards the main need being for smaller family sized dwellings (2- and 3-bedroom) and also smaller dwellings (1- and 2-bedroom). This is consistent with findings about household types in the sector, which has a higher than average proportion of households with dependent children and also single (non-older) people.

¹² <https://www.brighton-hove.gov.uk/sites/default/files/2021-05/ED02a%20Build%20to%20Rent%20Study%20Aug%202019.pdf>

The Private Rented Sector: Key Messages

- The private rented sector (PRS) accounts for around 16% of all households in Chelmsford (as of 2021) – a smaller proportion to that seen across the East of England, and below the national average (20%). The number of households in this sector has however grown substantially (increasing by 40% in the 2011-21 period).
- The PRS has some distinct characteristics, including a much younger demographic profile and a high proportion of households with dependent children (notably lone parents) – levels of overcrowding are relatively high. In terms of the built-form and size of dwellings in the sector, it can be noted that the PRS generally provides smaller accommodation when compared with the owner-occupied sector. That said, around 37% of the private rented stock has three or more bedrooms and demonstrates the sector's wide role in providing housing for a range of groups, including those claiming Housing Benefit and others who might be described as 'would be owners' and who may be prevented from accessing the sector due to issues such as deposit requirements.
- Additional analysis suggests that rent levels have increased over time (when looking at the 2012-22 period) but that increases in rents fall behind the increase in house prices over the same period. Increases in both rents and house prices have been in excess of the growth in earnings over the same period and arguably points to a shortage of private rented accommodation. The lack of homes to buy does appear to be a more pressing issue.
- This study has not attempted to estimate the need for additional private rented housing. It is likely that the decision of households as to whether to buy or rent a home in the open market is dependent on a number of factors which mean that demand can fluctuate over time; this would include mortgage lending practices and the availability of Housing Benefit. A general (national and local) shortage of housing is likely to have driven some of the growth in the private rented sector, including increases in the number of younger people in the sector, and increases in shared accommodation. If the supply of housing increases, then this potentially means that more households would be able to buy, but who would otherwise be renting.
- That said, the Council could be supportive of new private rented sector housing (including Built-to-Rent) where this can be seen to be of higher quality and potentially providing a housing offer that does not exist in any great quantity. Stock conditions in the PRS are generally worse than in other sectors and BtR housing could help to improve this situation. In addition, the age of tenants in the sector seems to be getting slightly older, and may contain more households with higher incomes. There may also be a market for essential local (key) workers due to income levels typically sitting between buying and renting a home.
- If accepting proposals for BtR it will however be important for the Council to ensure reasonable deliver of affordable housing. It is recommended the Council investigates targets in excess of 20% (which is the benchmark set out in PPG) and also to set rent levels at no more than the relevant Local Housing Allowance (to ensure homes are 'genuinely affordable'). The mix of homes to be developed will also need to be monitored with the evidence pointing to the main needs being likely to be smaller family sized dwellings (2- and 3-bedroom) and also smaller dwellings for single people and childless couples (1- and 2-bedroom).

8. Other Groups

Introduction

- 8.1 The final section of the report looks briefly at two specific groups in the population. Firstly those people wishing to commission or build their own homes (self- and custom-build housing) and secondly to review the potential need for accommodation for children in need of social services care following a Ministerial Statement in May 2023.

Self- and Custom-Build

- 8.2 The Self-build and Custom Housebuilding Act 2015 (as amended) places a duty on Chelmsford City Council to keep a Self-Build and Custom Housebuilding Register ('the Register') of individuals and groups who wish to acquire serviced plots of land to bring forward self-build and custom housebuilding projects.
- 8.3 The Council has a duty to grant sufficient planning permissions to meet the demand identified on the Register. Part of Chelmsford's policy response to this duty is Local Plan Policy DM1 which states that within developments of 100 dwellings or more, the Council will require 5% of dwellings to be self/custom build.
- 8.4 The level of demand is established by reference to the number of entries added to the Register during a "base period". The first base period begun on the day on which the register was established, 1 April 2016, and ended on 30 October 2016. Each subsequent base period is then the 12-month period immediately after the end of the previous base period. Subsequent base periods therefore run from 31 October to 30 October each year.
- 8.5 From the end of each base period, the Council has three years in which to permit an equivalent number of plots of land, which are suitable for self-build and custom housebuilding, as there are entries for that base period on the Register.
- 8.6 The Council has identified a total of 186 suitable development permissions that have contributed to meeting the identified demand on the Register. The following table is drawn from a Chelmsford City Council internal report¹³.

¹³ <https://www.chelmsford.gov.uk/media/cnyjcrm1/self-build-monitoring-statement-november-2022.pdf>

Figure 8.1: Chelmsford's performance in meeting demand identified through the Self and Custom Build Register based upon permissions granted			
Base period	Total no. applicants on register	Deadline for meeting base period demand	Development permissions granted to meet demand
1	20	30/10/2019	38
2	25	30/10/2020	41
3	39	30/10/2021	39
4	68	30/10/2022	68
TOTAL	152	-	186

Source: Chelmsford Council (figures in bold indicate where a number of permissions granted following the respective base period have been sufficient in meeting demand)

- 8.7 The table shows that to date, Chelmsford has successfully met the demand identified on the Self-Build and Custom Housebuilding Register through granting enough suitable permissions before the relevant deadlines.
- 8.8 It is worth noting that supply of self-build and custom housing is also driven by individuals who manage to acquire individual plots in conformance with appropriate policies of the Local Plan in towns and villages in addition to the large allocated sites.

Looked After Children

- 8.9 The Care Standards Act 2000 provides a definition of Children's Home stating 'an establishment is a children's home... if it provides care and accommodation wholly or mainly for children'. 'Wholly or mainly' means that most of the people who stay at a home must be children.
- 8.10 Key legislation relating to the accommodation and maintenance of a looked after child is defined and outlined in Sections 22A to 22D of the Children Act 1989. The legislation provides a framework within which decisions about the most appropriate way to accommodate and maintain children must be considered:
- Section 22A of the Children Act 1989 imposes a duty on the responsible authority when a child is in their care to provide the child with accommodation.
 - Section 22B of the Children Act 1989 sets out the duty of the responsible authority to maintain a looked after child in other respects apart from providing accommodation.
 - Section 22C of the Children Act 1989 sets out the ways in which a looked after child is to be accommodated.
 - Section 22D of the Children Act 1989 imposes a duty on the responsible authority to formally review the child's case prior to making alternative arrangements for accommodation.
 - Section 22G of the Children Act 1989 requires local authorities to take strategic action in respect of those children they look after and for whom it would be consistent with their welfare for them to be provided with accommodation within their own local authority area.

- 8.11 In a Written Ministerial Statement (WMS)¹⁴ made in May 2023, the Housing and Planning Minister reminded local authorities of their requirement to assess the housing need of different groups in the community including “accommodation for children in need of social services care”.
- 8.12 The WMS statement said “Local planning authorities should give due weight to and be supportive of applications, where appropriate, for all types of accommodation for looked after children in their area that reflect local needs and all parties in the development process should work together closely to facilitate the timely delivery of such vital accommodation for children across the country.
- 8.13 The WMS follows on from the Department of Education Implementation Strategy¹⁵ to fix children’s social care from February 2023. The “Stable Homes Built on Love“ Strategy has undergone a recent consultation the result of which have not yet been published.
- 8.14 The strategy outlines an ambition to transform Children’s Care through six pillars. The first of these pillars makes it clear that providing support to families is the first priority. This ensures that children can remain in their family home for as long as possible (Pillar 1) and then within their wider family if this is not possible (Pillar 3).
- 8.15 If both the immediate and wider family cannot look after a child then Pillar 4 seeks to ensure that “when care is the best choice for a child, it is critical that the care system provides stable, loving homes close to children’s communities.”
- 8.16 To achieve this the strategy aims to increase and support foster carers; develop a programme to support improvements in the quality of leadership and management in the children’s homes sector and pathfind Regional Care Cooperatives to plan, commission and deliver care places.
- 8.17 The report sets out a mission to “see an increase of high-quality, stable and loving homes available for every child in care, local to where they are from”. To do this it suggests that an immediate action is to “boost the number of the right homes in the right places available for children as a matter of urgency.”
- 8.18 The strategy notes “Local authorities have primary responsibility for the children in their care. This includes ensuring there is sufficient accommodation locally to meet the range of needs of children in care in their area” and that there is a “statutory duty to ensure there is sufficient provision for their children in care”.
- 8.19 It also states that the DfE “will continue to build on our work reforming supported accommodation for 16- to 17-year-olds. Semi-independent provision, including supported lodgings, can be the right option for some older children, but only where it is high-quality and the young person is ready for the level of independence it promotes.”

¹⁴ <https://questions-statements.parliament.uk/written-statements/detail/2023-05-23/hcws795>

¹⁵ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1147317/Children_s_social_care_stable_homes_consultation_February_2023.pdf

- 8.20 The Department will also continue “with the Children’s Home Capital Programme, which has seen £259 million of capital funding invested to increase provision in local authority-run open and secure children’s homes. We are working with local authorities to create new children’s homes and increase provision in their local area.”
- 8.21 At a similar time the government also launched a consultation on the “Children’s Social Care National Framework¹⁶” and the “Children’s Social Care Dashboard”.
- 8.22 The Framework sets out some of the outcomes to be measured including Outcome 4 relating to those seeking to insure “children in care and care leavers have stable, loving homes children in care and care leavers have stable, loving homes”.
- 8.23 The indicators include the percentage of children in care living in foster care and living in residential care and the distance of placements from home. This is important to ensure stability of schooling and contact with their siblings. The framework recognises that this will mean prioritising foster homes rather than residential homes.
- 8.24 The outcome can also be achieved by leaders undertaking “sufficiency planning and work with other local authorities and partners to jointly invest in care options that meet the future needs of children.”
- 8.25 In two-tier authorities such as Chelmsford the responsibility for children’s services falls with the County Council in this case that is Essex County Council. In January 2023, the County Council published the Essex Sufficiency Strategy for Children in Care and Care Leavers¹⁷. The narrative below draws on key data and information from this document.
- 8.26 As of August 2022, there were 1,140 Children in Care in Essex with the Sufficiency Strategy forecasting this to rise to 1,250 over the next two years – in part due to pressures from increasing numbers of separated migrant children. The proportion of children in care across Essex is however low in the context of other locations, representing around 34 per 10,000 children, compared with a national figure of 67 per 10,000. For Chelmsford the figure is even lower (21.6 per 10,000).
- 8.27 Across Essex, fostering is the most used form of care (68% of children) with a relatively low proportion in residential care (8%). The strategy also notes that whilst three-quarters of children in care are white, the numbers from minority ethnic groups has been rising.
- 8.28 Given the forecast increase in the number of Children in Care from 1,140 to 1,250 the Strategy also forecasts additional needs over the next two years, this includes:
- additional residential placements;
 - 76 additional foster placements; and
 - 17 additional supported accommodation placements for young people

¹⁶ https://consult.education.gov.uk/children2019s-social-care-national-framework/childrens-social-care-national-framework/supporting_documents/Childrens%20Social%20Care%20National%20Framework%20Consultation%20Document%20February%202023.pdf

¹⁷ https://www.essex.gov.uk/sites/default/files/migration_data/files/assets.ctfassets.net/knkzaf64jx5x/4gM61R56mQjZU2JzRqJCaN/7691e3095fb1463d1f2fdb277bc5d56f/DS22_7689_Sufficiency_Strategy.pdf

- 8.29 In terms of meeting demand, the County Council has used a traffic light system to highlight areas where difficulties in meeting demand are experienced currently and where difficulties are expected over the next four years. Over the four year period the only area with a 'red' flag is Tier 4 – which is understood to be Child and Adolescent Mental Health Services for those aged 13-18 years. In the short-term (currently) 'red' flags are attached to a number of areas, including mainstream residential, specialist residential and emergency beds.
- 8.30 The Sufficiency Strategy seeks to forecast demand over the next two years; this looks to be based on historic placement trends and an understanding of increases in separated migrant children.
- 8.31 In the longer-term it is possible to use the demographic projections developed in this report; the population projections linked to the Standard Method show an increase in those aged under 18 of around 5,200 between 2021 and 2040. This equates to a 14% increase. The table below shows this projection broken down into single year of age up to age 17 and it is notable that much of the projected growth is for younger cohorts within the 'children' category.
- 8.32 Some caution should be exercised in interpreting this data as projections of the number of children will be heavily influenced by fertility rates, which can be difficult to project/predict into the future – generally at a national level fertility rates have been dropping substantially over the past decade or so.

Figure 8.2: Under 18s Population change 2022 to 2041 – Chelmsford (linked to Standard Method)

Age	2022	2041	Change	% Change
0	1,891	2,437	546	28.9%
1	1,848	2,373	525	28.4%
2	1,967	2,469	502	25.5%
3	2,019	2,513	494	24.5%
4	2,088	2,469	381	18.3%
5	2,138	2,437	299	14.0%
6	2,167	2,429	262	12.1%
7	2,134	2,376	242	11.3%
8	2,244	2,427	183	8.2%
9	2,127	2,382	255	12.0%
10	2,324	2,411	87	3.7%
11	2,166	2,343	177	8.2%
12	2,302	2,400	98	4.3%
13	2,235	2,456	222	9.9%
14	2,244	2,390	146	6.5%
15	2,082	2,402	320	15.4%
16	2,281	2,471	190	8.3%
17	2,151	2,472	321	14.9%
Total (0-17)	38,408	43,657	5,249	13.7%

Source: Demographic Modelling

- 8.33 As per the current rate of 21.6 per 10,000 of children in care, this additional population would result in 11 additional children requiring to be looked after (a higher figure of 19 if using the Essex prevalence rate and 35 with national figures). This would only be required if current rates are continued, and it is possible that these numbers may be able to be cared for in home or within a foster home.
- 8.34 The WMS statement said “Local planning authorities should give due weight to and be supportive of applications, where appropriate, for all types of accommodation for looked after children in their area that reflect local needs”.
- 8.35 The national policy direction is to provide in-situ support, followed by familial and foster support. Therefore the demand for care homes will largely be determined by the success of these policies. Where this is not possible, then local authorities will be required to provide safe accommodation in the right places.
- 8.36 If additional supply for children is required, the Council could seek to include such accommodation as part of wider, appropriately located, housing developments and could be covered by Policy DM1C – Specialist Residential Accommodation. This might be in the form of 3-4 bedroom “ordinary homes” and could be managed by a combination of the County Council and through external providers.
- 8.37 Such sites should align with most appropriate locations according to Ofsted’s Location Assessment¹⁸ for such accommodation. In summary, this includes ensuring safeguarding concerns are met and that children have access to services.
- 8.38 There will also be a need for supported accommodation for young adults and the Council should work with County Council and Registered Providers to explore opportunities to provide this through developer contributions and in the existing stock. This would also include meeting the needs of homeless households and those in temporary accommodation – these groups being highlighted in the Chelmsford Housing Strategy¹⁹ as having the greatest housing needs.

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https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/339545/Children_s_homes_regulations_amendments_2014.pdf

¹⁹ <https://www.chelmsford.gov.uk/media/fzeis02v/chelmsford-housing-strategy-2022-to-2027.pdf>

Other Groups: Key Messages

- As of 1st April 2016, and in line with the 2015 Act and the Right to Build, relevant authorities in England are required to have established and publicised a self-build and custom housebuilding register which records those seeking to acquire serviced plots of land in the authority's area in order to build their own self-build and custom houses.
- To help meet the demand for self- and custom-build housing the Council has Local Plan Policy DM1 which states that within developments of 100 dwellings or more, the Council will require 5% of dwellings to be self/custom build. Data from the Council suggests that the demand has successfully been met with enough suitable permissions before the relevant deadlines. On that basis, it is suggested the Council continues with their current approach to custom- and self-build housing.
- In a Written Ministerial Statement (WMS) made in May 2023, the Housing and Planning Minister reminded local authorities of their requirement to assess the housing need of different groups in the community including “accommodation for children in need of social services care”. The WMS statement said “Local planning authorities should give due weight to and be supportive of applications, where appropriate, for all types of accommodation for looked after children in their area that reflect local needs and all parties in the development process should work together closely to facilitate the timely delivery of such vital accommodation for children across the country.
- Across Essex and Chelmsford, the proportion of children in care (CiC) is low in a national context; 21.6 per 10,000 children in Chelmsford, 34 per 10,000 across Essex and 67 per 10,000 nationally. The majority of CiC in Essex are in foster care (68%) with only 8% in residential care.
- Using the Chelmsford prevalence rate and linking to demographic projections it is estimated the number of CiC would increase by 11 in the period to 2041 and this does not point to any significant additional need in the future although the Council should monitor numbers as it is likely these can fluctuate over time (including due to the influence of separated migrant children).
- If additional supply for children is required, the Council could seek to include such accommodation as part of wider, appropriately located, housing developments and could be covered by Policy DM1C – Specialist Residential Accommodation. This might be in the form of 3-4 bedroom “ordinary homes” and could be managed by a combination of the County Council and through external providers.
- The Council should work with Registered Providers to explore opportunities to provide supported housing through developer contributions and in the existing stock to meet the needs of homeless households and those in temporary accommodation – these groups being highlighted in the Chelmsford Housing Strategy as having the greatest housing needs.

Comment

Consultee	Shamsul Hoque (1338584)
Email Address	PlanningEE@NationalHighways.co.uk
Company / Organisation	National Highways
Address	Spatial Planning operations (East) Woodlands Bedford MK41 7LW
Event Name	5. Danbury Neighbourhood Plan Reg 16 Consultation
Comment by	National Highways (Shamsul Hoque - 1338584)
Comment ID	DNP-132
Response Date	19/06/24 16:19
Status	Processed
Submission Type	Email
Version	0.4

Officer Q1

Was this representation received late?

(Please select one answer)

Yes

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below General

Question 2

Please add your comments below

Please see attached letter

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

If you wish to submit any supporting information, please upload it here [DNP-132 National Highways - Attachment.pdf](#)



Our ref: NH/24/06600 Danbury Nh Plan
Your ref: Danbury Neighbourhood Plan Consultation

Planning Policy Team
Spatial Planning Services
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19 June 2024

Via email to: planning.policy@chelmsford.gov.uk

Attention to:

Dear Sir/Madam,

CONSULTATION ON DANBURY NEIGHBOURHOOD PLAN

Thank you for your correspondence, dated on 08 May 2024, notifying National Highways of the consultation above.

National Highways is responsible for the operation, maintenance, and improvement of the Strategic Road Network (SRN) in England on behalf of the Secretary of the State. In the area within and surrounding the Danbury Neighbourhood, we have responsibility for the trunk road A12.

We have completed our review of the details and information provided on the proposed Danbury Neighbourhood Plan 2023-2036, dated March 2024.

National Highways comments below:

Vision Statement: We support the principles for the proposed Vision Statement and Objectives, which are presented in the document.

Housing and Development: In relation to the proposed housing growth, National Highways acknowledge the process involved for the site selection and allocation (Policy DNP1) stated in para 5.5.

Transport and Movement: All major traffic movements involve A414 (local road network). We would be interested to understand the proposed Priority 1 (Main Road or Maldon Road) road improvement proposal which may involve intensification of traffic growth



towards A12 Junction 18. The location of this neighbourhood and proposal on the connectivity (para 7.11 to 7.12 and Table 2) are not related to the nearest SRN junction.

In addition to above, National Highways is already involved in the recent consultation with the Chelmsford Local Plan.

In relation to the following documents, National Highways do not have any comment.

- i) The Basic Conditions Statement – including Area Statement and Habitats Regulation Assessment Screening
- ii) Strategic Environmental Assessment
- iii) A Consultation Statement and
- iv) An Equalities Impact Assessment.

We do not have any more comments on this.

Please contact us PlanningEE@nationalhighways.co.uk if you require any clarification.

Yours faithfully,

S. H.
Shamsul Hoque
Assistant Spatial Planner

Comment

Consultee Mr Jonathan Thombs (1357634)

Email Address

Address

Event Name 5. Danbury Neighbourhood Plan Reg 16 Consultation

Comment by Mr Jonathan Thombs (1357634)

Comment ID DNP-133

Response Date 03/06/24 16:38

Status Submitted

Submission Type Web

Version 0.2

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / table / supporting document number below Submission Plan - 5.13, 5.17, 5.18

Question 2

Please add your comments below

As per Submission plan 5.13 & 5.17 this site assumes acces via Little Fields. For this to occur it would require access across land owned by a property at the top of Little Fields. I therefore believe that the developer does not have guaranteed right of access from Little Fields. As such it would be inappropriate to include this site in the proposed plan until this is resolved. Alternative acces may be required via the A414 which would introduce another entrance onto a section of road where safety is already of concern and further mitigating circumstances amy be necessary. There may, for example, have been other sites within Danbury that could replace this given the apparent limitations.

I would also like to comment on 5.18, the impact on the heritage assest of Garlands farmhouse is in my view underrated and I draw yor attention to the recent appeal result (for land bordering this location - file attached)

In this document para 23 refers to the impact of rural isolation dimishment on the heritage asset and para 9 states that developemnt in the vicinity of Garlands farmhouse conflicts with national policy DC18. As such I do not believe that an assesment has been made correctly. I do not believe this site is suitable.

Question 3

Do you wish to be notified of the decision on the Danbury Neighbourhood Plan? Yes

If you wish to submit any supporting information, please upload it here Appeal Decision- Land east of Little Fields and Runsell View, Danbury.pdf



Appeal Decision

Inquiry held on 30- 31 January, 1-2 and 6-8 February 2018

Site visit made on 7 February 2018

by Christina Downes BSc DipTP MRTPI

an Inspector appointed by the Secretary of State

Decision date: 05 March 2018

Appeal Ref: APP/W1525/W/17/3176978

Land east of Little Fields and Runsell View and north of Maldon Road, Danbury, Chelmsford

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant outline planning permission.
 - The appeal is made by Gladman Developments Ltd against the decision of Chelmsford City Council.
 - The application Ref 16/01810/OUT, dated 7 October 2016, was refused by notice dated 20 January 2017.
 - The development proposed is for up to 140 residential dwellings (including up to 35% affordable housing), introduction of structural planting and landscaping, informal public open space and children's play area, surface water flood mitigation and attenuation, two vehicular access points: one from Maldon Road and one from Runsell Lane and associated ancillary works.
-

Decision

1. For the reasons given below, the appeal is dismissed.

Procedural Matters

2. The application was made in outline form with all matters other than access reserved for consideration at a later stage. Although the Development Framework Plan showed internal circulation routes it was made clear that this was for illustrative purposes and had been treated as such in the council's determination. It seems to me that the public open space and balancing ponds are likely to be in the general area shown on this plan. Although their size and design could change this would be in the context that the maximum number of dwellings could still be accommodated on the site. It is appreciated that the words "up to" 140 dwellings give the potential for a lesser number. However, there is no evidence on which a lower cap could reasonably be based.
3. Before the inquiry started the appellant requested that a smaller scheme for up to 90 dwellings be substituted under the "Wheatcroft principles". This included increased open space and a single access from Maldon Road. This is also the subject of a planning application which, by the close of the inquiry, had not been determined by the council. Having considered the matter carefully I did not agree to this revision because, regardless of the procedural aspects, I did not consider that the scheme would remain substantially the same.
4. At the inquiry I was asked to agree to the removal of the proposed vehicular access onto Runsell Lane, which would result in a single access onto Maldon

Road. I am satisfied that this change would not prejudice the council's case or that of any other party. The appellant also amended the description of the proposal to delete reference to "up to" 35% affordable housing.

5. A draft planning obligation by unilateral undertaking (the UU) was submitted at the inquiry. I had some comments and the council also had concerns about whether one of the open space covenants would duplicate the Community Infrastructure Levy. Changes were made to the document and I gave the appellant further time to submit a certified copy of the executed document.

Reasons

Policy context and the approach to decision making

The development plan

6. The proposal must be determined in accordance with the development plan unless material considerations indicate otherwise. The development plan includes the *Core Strategy and Development Control Policies Development Plan Document 2001-2021 (CS)* adopted in 2008 and the *Site Allocations Development Plan Document* adopted in 2012. *The Core Strategy and Development Control Policies Focused Review (FR)* was undertaken to update selected policies in the CS in line with the *National Planning Policy Framework (the Framework)*. The FR was adopted in 2013.
7. Policy CP2 in the CS establishes the spatial strategy and focuses development in the main urban areas of Chelmsford and South Woodham Ferrers with supporting development within the Key Defined Settlements, including Danbury. It also sets out a housing requirement of some 700 dwellings per annum (dpa) based on figures in the draft East of England Plan. Regional Strategies no longer exist and there is no dispute that this figure was not based on full objectively assessed need for market and affordable housing as is required by paragraph 47 of the Framework. This policy was not considered in the FR.
8. In the FR policy CP5 seeks to contain urban growth within the urban areas and defined settlements and to protect the intrinsic character and beauty of the countryside within the rural areas. Policy DC2 establishes that the countryside will be protected for its intrinsic character and beauty and sets out a limited range of development that would be acceptable. The appeal site is outside the Danbury settlement boundary and within the countryside for policy purposes. General market housing of the type proposed in this appeal is not included as one of the acceptable development types in policy DC2. In such circumstances the appeal proposal would conflict with policies CP2, CP5 and DC2.
9. Policy DC18 in the CS concerns listed buildings. It indicates that where a proposal fails to preserve or enhance the special character or setting of a listed building, planning permission or listed building consent will be refused. There was no dispute that a degree of harm would be caused to Garlands Farmhouse, a Grade II listed building to the east of the site. In such circumstances the appeal proposal would conflict with policy DC18.

Approach to decision making

10. There was a great deal of debate at the inquiry as to whether the relevant policies are up-to-date in terms of the Framework. Policy CP2 advances a

spatial strategy that directs development to sustainable locations and there was no dispute that this is broadly consistent with principles advocated in the Framework. However, it also includes a housing requirement of 700 dpa that is neither up-to-date nor based on an objective needs assessment. It relies on the urban areas and Key Defined Settlements, which have been drawn up to accommodate a much lower level of growth up to the period of 2021.

11. The council has now undertaken such an assessment for its emerging Local Plan and is using the figure of 805 dpa. This has yet to be independently tested through the examination process. However, for the purposes of this appeal it provides the best available evidence of objectively assessed need. The council is currently able to identify some 5.9 years of deliverable housing taking account of the backlog and a 20% buffer. The council's evidence demonstrated that at least 5 years of that supply could be accommodated within the existing development boundaries. These points were not challenged by the appellant and the second part of paragraph 49 of the Framework is thus not engaged.
12. Paragraph 215 requires a consideration of consistency with Framework policies. Paragraph 47 seeks to boost significantly the supply of housing. It contains various provisions but the Court of Appeal in *Daventry*¹ established that most relate to a council's plan-making function, including the requirement for a supply of developable sites later in the plan period. On the other hand, the requirement to update annually a five year supply of deliverable sites is also applicable to decision-making. In such circumstances the inability of the council to accommodate its longer term housing requirement within the CS development boundaries does not mean that policy CP2 is superseded by the more recent guidance in paragraph 47 for the purposes of this appeal. The new Local Plan will identify longer term needs to 2036 and this will inevitably require greenfield sites outside of the existing defined settlements. New development boundaries will then be established around the site allocations.
13. Even though the housing numbers in policy CP2 are out-of-date the spatial strategy accords with the Framework and this was not disputed by the appellant. For Danbury the emerging Local Plan envisages 100 houses in the period to 2036. Assuming that this is found sound when the plan is examined, the location of these dwellings would be a matter for the local community through the Neighbourhood Plan. This is at a very early stage and has little weight at present. Nevertheless this approach to housing supply would be planned, which is a core planning principle of the Framework.
14. The principles underlying policies CP5 and DC2 in the FR are in accordance with the Framework insofar as they seek to protect the intrinsic character and beauty of the countryside. It is appreciated that Paragraph 17 of the Framework uses the term "recognise" rather than "protect". However, paragraph 3.5 of the FR makes clear that not all countryside is of similar quality and that this should be judged on a site-by-site basis. This is far from adopting a position of blanket protection and was clearly satisfactory to the Examining Inspector who found these policies to be sound. The operation of both policies is linked to policy CP2 and the settlement boundaries. My colleague was not being asked to review the soundness of this element of the CS. However, I have found that these boundaries are able to meet the

¹ *Gladman Developments Limited v Daventry District Council and the Secretary of State for Communities and Local Government* [2016] EWCA Civ 1146.

- requirement in the Framework to accommodate a five year supply of deliverable housing sites based on objectively assessed needs. However, this does not give encouragement to general housing development beyond the settlement limits because the objective of the policy is to contain urban growth.
15. For all of the above reasons I do not consider that policies CP2 in the CS and policies CP5 and DC2 in the FR are inconsistent with Framework policy. In such circumstances I conclude that the conflict with them is a matter of substantial weight. There are a number of housing appeals to which I have been referred and these have reached different conclusions in respect of whether policies CP2, CP5 and DC2 can be considered up-to-date. It is of course important for decisions to be consistent but this is within the context of similar circumstances and comparable evidence. As far as I am aware in the more recent decisions, including Old Chase Farm, Great Leighs and Bicknacre² the Inspectors were not given the same evidence that the council will be able to accommodate its five year supply without breaching the designated settlement boundaries.
 16. Policy DC18 in the CS concerns listed buildings but does not distinguish between proposals that cause substantial or less than substantial harm. More importantly it does not allow any account to be taken of public benefits. This policy was not considered in the FR and whilst it may be in accordance with the statutory test it is not consistent with paragraph 134 of the Framework. This makes clear that in the case of less than substantial harm, a balance is required between harm and public benefits. In terms of the setting of heritage assets the Court of Appeal determined in *Mordue*³ that if such an approach is taken, the statutory test will be satisfied.
 17. I do not consider that provided an appropriate balancing exercise is undertaken by the decision-maker the issue of consistency is resolved. This was the approach taken by the Inspector in the recent Maldon Road, Danbury appeal decision⁴, albeit in relation to conservation areas. However, to my mind policies should be read in a straightforward way and should not be embellished by inserting additional provisions. For this reason I disagree with my colleague and consider that policy DC18 is not consistent with the Framework and that the conflict with it is a matter of limited weight.
 18. Policy CP1 seeks to secure sustainable development and was considered in the FR. It includes the provisions of paragraph 14 of the Framework in respect of the presumption in favour of sustainable development and thus affords them statutory weight. Policy DC18 is a relevant policy in this appeal and it is out-of-date. In such circumstances the approach to decision making is as set out in the two bullet points in the policy. There is no dispute that there are heritage and nature conservation issues and that in relation to these matters the Framework includes restrictive policies. In such circumstances it is only if the appeal proposal would not offend these policies that the "tilted balance" in the first bullet of policy CP1 would be applied.

² APP/W1525/W/16/3162344 (10 January 2018); APP/W1525/W/15/3121603 (26 September 2016); APP/W1525/W/15/3129306 (20 July 2016).

³ Aiden Jones v Jane Margaret Mordue, Secretary of State for Communities and Local Government and South Northamptonshire Council [2015] EWCA Civ 1243.

⁴ APP/W1525/W/17/3178243 (15 January 2018).

The effect of the proposal on the Grade II listed Garlands Farmhouse

Baseline

19. Although reference was made by some objectors to other listed buildings in the vicinity, I consider that the only designated heritage asset to be affected would be Garlands Farmhouse. This is a late 18th century or early 19th century property sited on the north-eastern side of Runsell Lane. The building is two storeys in height with attic rooms. It has four bays and brick elevations that have since been colour-washed. Much of its significance is derived from the fabric along with the immediate curtilage and outbuildings. These features provide evidential, aesthetic and historic illustrative value to the heritage asset and would not be affected by the proposed development.
20. Garlands Farmhouse is now in use as a private dwelling and is in separate ownership to its extensive former landholding. The functional link between the two has therefore been severed. There has been some residential development on the western fields but there remains a sense of rural isolation, notwithstanding the encroachment of the developed edge of Danbury and the intrusion of traffic noise along the busy Maldon Road. The rural setting of the former farmhouse can still be readily appreciated. This is because the former agricultural holding remains largely intact and many of its historic boundaries are still in place. This setting undoubtedly contributes to the heritage significance of Garlands Farmhouse. The exact extent of the former landholding may only be evident from a study of the historic maps. Nevertheless, the agricultural associations that existed between the former farmhouse and its land can be readily appreciated and this is due in large part to the wide open views and the accessibility of public viewpoints from all directions.
21. Rather than being located well within its landholding, Garlands Farmhouse stands on the eastern edge and close to Runsell Green. In the 19th century this was a small hamlet that appears to have had its own shop and public house. It would therefore have provided economic and social advantages to the farmer and his family. Nonetheless the farmhouse was located a short distance from the hamlet, although this gap has now been eroded by modern housing. Its orientation seems to me to be more towards its farmland than towards the village green.
22. The majority of the former landholding lay to the north and west and adjoined what would have been the working side of the farmhouse with its farmyard and outbuildings. However, the main elevation that provided its public face was orientated to the south-west and faced towards the fields of what presently comprises the appeal site. It seems to me that the association with this farmland can still be readily appreciated and provides an agrarian view that is largely intact today, notwithstanding the modern intrusions mentioned above.

Impact of the proposed development

23. The relationship of Garlands Farmhouse with Runsell Green and the farmland to the north and west would remain largely unchanged as a result of the appeal scheme. Views of the development would mostly be at a distance and within the context of the settlement edge that exists at present. However, there would be a significant change to the south-west. It is appreciated that the proposal includes public open space in the south-eastern corner of the site. I

was told that this could be enlarged if considered necessary and that dwellings could be located to retain views of the former farmhouse from Maldon Road. However, even though the public open space may be akin to a village green it would also contain a children's play area with its play equipment. In any event the setting comprises agricultural land and it is this that provides the historical association. Furthermore, even if views of the former farmhouse prevailed these would be seen within the context of access roads, street lighting and new houses. Furthermore, when viewed from Runsell Lane, which cuts through the former landholding, the proximity of suburban development would considerably diminish the present sense of rural isolation, which is important to appreciating the historic value of the heritage asset. The legibility of the former farmhouse sited within its agricultural setting and the way that it would be experienced would be considerably diminished, in my judgement.

24. It is appreciated that only 12-14% of the former landholding would be lost to development and that, in this case, the setting is not as important to the significance of the heritage asset as the fabric of the building or its immediate curtilage. Nevertheless, in my opinion the agricultural land to the front of the farmhouse is important to the appreciation of the heritage asset within its rural context. The proposed development would cause significant harm in this respect for all of the reasons given above. This would be contrary to policy DC18 in the CS.
25. There is no dispute that the ensuing harm would be less than substantial in terms of paragraph 134 of the Framework. However, these words do not mean that the harm would be unimportant or of little consequence. I do not agree with the appellant that this would be of a minor nature or at the lowest end of the scale. In any event, there is no provision within either the Framework or the associated Planning Practice Guidance for gradation of harm along some sort of spectrum. Paragraph 134 requires a balancing exercise of the harm against public benefits and this will be carried out later in the decision. However it is worth noting here that the Court of Appeal held in *Barnwell Manor*⁵ that any harm to a listed building should be given considerable importance and weight in the balancing exercise.

The effect of the proposal on ecological interests

On-site ecology

26. There was much local concern about the effect of the development on the ecology of the site. However, taking account of the appellant's ecological surveys, undertaken in 2016 and also 2017 in connection with the 90 unit scheme, I do not consider that there is evidence that protected species or important habitats would be harmed by the appeal proposal. The green corridor along the stream that crosses the site would be retained and enhanced and connectivity would also be provided by existing and new hedgerow planting. It is a legal requirement to ensure that protected species, including bats and badgers, are not harmed by the development process. A planning condition is proposed for the submission, approval and implementation of a biodiversity enhancement and management plan. I see no reason why the scheme should not result in a net improvement to the ecological interest of the site.

⁵ *East Northamptonshire v Secretary of State for Communities and Local Government* [2015] 1 W.L.R. 137.

Baseline and Natural England's position

27. Natural England (NE) has raised objections on the grounds that there is insufficient information provided to be satisfied that harm would not be likely to three Sites of Special Scientific Interest (SSSI) near to the site. The closest is Woodham Walter Common SSSI, which is a relatively short walk along Runsell Lane from the northern corner of the site. Blake's Wood and Lingwood Common SSSI are a little further to the north-west and Danbury Common SSSI is to the south-west and likely to involve a car journey. All of these sites are within the Impact Risk Zones identified by NE to reflect the particular sensitivities of the interest features for which they are notified. In the case of Woodham Walter, Blake's Wood and Lingwood Common the notified features include the woodland whereas at Danbury Common the notified features include the heath and grassland.
28. NE's concern relates to the potential harm that could arise to the interest features of the SSSIs as a result of increased recreational pressure from as many as 140 new households. Due to their proximity they provide an attractive recreational amenity, particularly for walkers with or without dogs and for cyclists, including those riding mountain bikes. Damage can be caused by trampling and compaction of woodland and heathland habitats. Dog fouling can also adversely affect sensitive habitats.
29. NE has not said that interest features are being harmed by present levels of use although it comments that there is evidence that carrying capacity may be being reached. It points out that in some areas there is evidence of recreational damage and this is reiterated by the National Trust, who own Lingwood Common, parts of Blake's Wood and much of Danbury Common SSSIs. I saw some evidence of this myself and noted in my walk through part of the Woodham Walter SSSI that informal paths are prevalent through the woodland area. I also saw the effects of mountain biking at Danbury Common where there are well worn bare surfaced tracks through the woodland taking full advantage of the steep slopes and undulating terrain. I understand that there is a circuit between the three SSSIs that is used by participants of this sport.
30. NE does not allege that the appeal development would necessarily tip the balance in terms of harm through additional recreational use. However, adopting a precautionary approach it considers that this cannot be clearly ruled out without a visitor monitoring survey to establish a baseline of the extent and patterns of existing usage. This would then be used to inform what, if any, mitigation or avoidance measures would be necessary to accommodate the additional usage arising from the proposed development. There was a great deal of debate at the inquiry as to whether NE changed its mind regarding the visitor survey issue between the response it gave to the appellant in January 2017 and its current position. The appellant maintains that there was no reference to such a requirement at the earlier date otherwise a visitor survey would have been done. Nonetheless, no-one is in any doubt about NE's position now and its advice in respect of this appeal is unequivocal.
31. The matter is perhaps complicated by the fact that in October 2017 the appellant submitted a planning application for up to 90 dwellings. This was also being discussed with NE through its Discretionary Advice Service. NE's conclusion on that scheme was that there was unlikely to be damage to the interest features of the SSSIs, subject to a package of mitigation. This included

a visitor survey but not as a requirement in advance of a planning permission being granted. It was made clear at the inquiry that the appellant considers that the same approach should be applied to the 140 unit scheme. However, it is not just the addition of 50 households that is at issue. The smaller scheme would also be able to provide a considerable improvement to the quality and quantity of public open space and thus enhance the recreational opportunities available to residents on-site as a realistic alternative to using the SSSIs.

Impact of the proposed development

32. It is appreciated that the appeal proposal is only an outline scheme and that the 0.94 ha of open space shown on the Development Framework Plan may be able to be increased. However, this would have to be within the context of providing a development of 140 dwellings of a suitable mix and character for this edge of settlement location. There has been no assessment of the extent to which the open space could be improved, bearing in mind these constraints. In such circumstances and taking a precautionary approach, it seems to me that the open space would be likely to be suitable for short dog walks but not for longer excursions where pets are let off the lead. This is especially the case bearing in mind that a children's play area is also to be included within this open area. Those wishing to go out for a longer walk with or without a dog or use their mountain bikes are unlikely, in my opinion, to find the on-site open space particularly attractive. NE has had to make a judgement based on its experience but at the Government's adviser on the natural environment I afford its response substantial weight.
33. In December 2017 the appellant submitted a SSSI Impact Assessment. Its purpose was to consider the potential impact of the appeal development on the SSSIs. It looked at their current condition and included an assessment of the likely increase in numbers of dog walkers and cyclists. However, its conclusion that there would only be a small increase as a result of the proposed development was based on the assumption that all existing visitors were from the local ward. Furthermore, the frequency of existing visits and the attraction of recreational alternatives was not satisfactorily considered. From the information provided it is difficult to know whether or not the assumed baseline was realistic and therefore what the likely impact of the additional visitors from the development would be. Furthermore, it seems likely that there would not be an even spread of visitation, taking account of the locations of the SSSIs relative to the appeal site.
34. The appellant placed a considerable amount of emphasis on the "favourable" condition of all but two of the units in the three SSSIs. This resulted from surveys in November 2009 and means that the special interest features are being adequately conserved at the moment. Nevertheless, for the reasons I have already given both NE and the National Trust have identified concerns about recreational use and it is noted that the SSSI Impact Assessment also referred to some deleterious effects from trampling and mountain biking. In the circumstances NE's approach that potential threats should be anticipated and that action should not be delayed until the SSSIs begin to tip over into an unfavourable condition seems to me entirely reasonable.
35. Danbury is not well served by public open spaces but there are alternative recreational options, especially if information packs were provided to new householders to explain the choices. For example, there are nearby public

footpaths and rights of way outside the SSSIs that would provide an alternative option for walkers and those wishing to exercise their dogs. Danbury Country Park is a further possibility for recreational activity although it is relatively small, further away than the SSSIs and visitors have to pay to use its car park. Nevertheless, it is very likely that the SSSIs, which provide extensive and attractive areas in which to walk or cycle, would prove a popular and convenient option for new residents. However, without information on the current extent and pattern of visitors to the SSSIs it cannot be concluded with any confidence that the additional usage could be satisfactorily accommodated.

Proposed mitigation

36. Whilst the appellant does not consider that harm would ensue, a package of avoidance and mitigation measures has been proposed. For the reasons given above and on the basis of a precautionary approach it cannot be assumed that such measures would not be required. A planning condition is proposed that requires a visitor survey to be undertaken before reserved matters are submitted. This would effectively be the missing piece of the jigsaw that would be used to inform whether avoidance or mitigation measures would be necessary and if so what they should be. Unfortunately though, as NE itself has pointed out, such measures cannot be confidently costed before the findings of the survey are known. In such circumstances, it cannot be determined whether the various contributions towards avoidance and mitigation in the UU would be justified. They could be too high, they could be too low or they may not be necessary at all. In such circumstances the relevant planning obligations would not meet the tests in paragraph 122 of the Community Infrastructure Regulations and could not be taken into account in any grant of planning permission.
37. One of the contributions is for £30,000 to upgrade greenspace in Danbury in order to divert recreational users away from the SSSI. Setting aside whether it is justifiable to apply the same formula as used for calculating Suitable Alternative Natural Greenspace (SANG) contributions at Ashdown Forest, the council seemed at a loss as to what it would do with the money. There was no evidence that there was an insufficiency of dog bins or that the signage on footpaths needed improving and the council could not call to mind any project to which this money could contribute.
38. Although this is only an outline planning application, it is necessary at this stage to be specific with regards to the planning obligations. This is because once outline planning permission has been granted there is no mechanism by which further funds could be required and, in the case of a UU no mechanism by which excess funds could be repaid to the developer. Although NE has agreed a visitor survey post-decision in the case of the 90 unit scheme, this would also be subject to similar problems if mitigation payments were being made.
39. Paragraph 118 of the Framework seeks to conserve and enhance biodiversity. On the site I consider that the appeal proposal would meet this objective. However, for all the above reasons it is concluded that there would be a likely adverse effect on the notified special interest features of Woodham Walter SSSI, Blake's Wood and Lingwood Common SSSIs and Danbury Common SSSI. This would be contrary to policy DC13 in the CS. Paragraph 118 of the Framework makes clear that an exception should only be made where the

benefits of the development at the site clearly outweigh the likely impacts. I return to consider this later in the decision.

The effect of the proposal on the character and appearance of the area

Baseline

40. The appeal site comprises agricultural land on the eastern side of Danbury. At this point the settlement edge runs along the southern side of Maldon Road where residential properties stand varying distances back from its frontage. The north-western boundary of the appeal site adjoins the rear gardens of dwellings in Runsell View, which are mainly delineated by fences. To the south-west the site boundary adjoins two fields, which are relatively well enclosed with trees and hedgerows and provide screening to Little Fields beyond. The eastern site boundary adjoins Runsell Lane and beyond this is open countryside, apart from the houses around Runsell Green, Garlands Farmhouse and Garlands Cottage. The site itself rises to a high point towards its north-western corner and drops down to a small stream before rising again to a plateau in the section closest to Maldon Road. The stream is bordered by vegetation, including a line of willow trees. The western site boundary mainly comprises hedges and trees whilst along Runsell Lane it is mainly open other than a hedge along part of the lower section.
41. In the *Braintree, Brentwood, Chelmsford, Maldon and Uttlesford Landscape Character Assessment* (the LCA) the site is within the Little Baddow and Danbury Wooded Farmland Landscape Character Area. Key characteristics include the wooded hill and ridge housing of the linear settlement of Danbury; the sense of enclosure provided by large areas of woodland; arable farmland fringing the outer edges of the woodland and narrow lanes winding down the hillsides with views across the Chelmer and Blackwater valleys to the north and east. Overall the landscape character area is judged in the LCA to have a relatively high sensitivity to change.
42. As part of the evidence base to the emerging Local Plan consultants were commissioned to undertake a *Landscape Sensitivity and Capacity Assessment*. Location DLP1 is subdivided into the appeal site (DLP1b) and the fields immediately to the south-west (DLP1a). The assessment considered that the land shares some of the key characteristics of its character area, including its hillside landform and open farmland that fringes the outer woodland areas. However, it concluded that it is an ordinary non-designated landscape with detracting influences such as loss of hedgerows and the settlement edge. Overall it judges the land parcel to have moderate landscape sensitivity and value. However, due to its openness, sloping landform and higher number of public and private views it considered the visual sensitivity of DLP1b to be higher than that of the well enclosed DLP1a.

Landscape impacts

43. The character of the site itself would completely change from open fields to an estate of houses. In the wider context there would be a band of new hedge planting along the Runsell Lane boundary and this would create some sense of enclosure once it had become established. The existing settlement edge is particularly apparent along Maldon Road and Runsell View and this is a detractor in the landscape. However, the proposal would provide a new built edge, which would extend along much of the Runsell Lane frontage. Although

houses would be set back behind the new hedge line they would be very apparent due to the undulating topography. Runsell Lane is a typical narrow country lane winding down the hillside as referred to in the LCA. The development would change its character significantly.

44. Although the site provides a green indentation to the settlement I am not convinced that this is a particular feature of Danbury. It is not unusual for settlements to develop along road frontages and the *Danbury Planning Framework* mentions how the village radiates out from its centre at Eve's Corner. However, it also refers to the modern residential developments and to my mind these have resulted in a more haphazard settlement pattern as new housing has expanded to fill the spaces between the historic linear settlement. Of course there are green spaces left in between but this seems to me to be more likely as a result of happenstance than design. It is the way that settlements often evolve and is not, in my opinion, special to Danbury or these hilltop villages. More importantly there would remain two large fields between the south-western boundary of the development and the existing settlement edge. To my mind this would result in a rather awkward and artificial relationship between the existing settlement and the new development.
45. There would also be a significant loss of hedgerow along Maldon Road. Whether this could be successfully replanted would depend on the repositioning of the footway and the need to keep sight lines clear. The Development Framework Plan indicates public open space and green space around the drainage attenuation ponds and along the small valley. I have no doubt that this could be attractively designed and made to look natural through the submission of the landscaping proposals. However, it should be remembered that this would be constrained by the scale of development being proposed. There could be as many as 140 dwellings with their associated gardens and the requisite roads, parking areas and footways needed to serve them.
46. The idea of introducing parkland type trees and small wooded copses seems to me rather fanciful. To my mind this would be a substantial urbanisation to the east of the village. Even if the appellant is correct in terms of the sensitivity of the landscape I consider that overall the magnitude of change has been underestimated in the appellant's Landscape and Visual Impact Assessment (LVIA) both at completion and at year 10. In my judgement the landscape impact on the Little Baddow and Danbury Wooded Farmland Landscape Character Area would be moderate adverse both in the short and longer term.

Visual impacts

47. I undertook an extensive site visit and saw the site from the nearby roads, footpaths and public rights of way. I also visited each of the appellant's LVIA viewpoints. As already established the area is popular with those walking with or without dogs. These receptors have a high sensitivity to change and, in my judgement, the magnitude of change that they would experience from the closer viewpoints such as Runsell Lane and Twitty Fee has been underestimated in the LVIA, notwithstanding the detracting influence of the existing settlement edge. From further away on the public footpaths and rights of way to the east I generally agree with the appellant's assessment.
48. Residential occupiers would also have a high sensitivity to change and again I consider that the magnitude of change has been underestimated in the LVIA. Some properties in Maldon Road are relatively close to the road and the

occupiers would, to my mind, experience a high magnitude of change due to the substantial amount of hedge loss to provide the new access and the rising nature of the landform. This may decrease in year 10 if replanting behind the sight lines and footway is successful. Residents in Runsell View would similarly experience a high magnitude of change and this is unlikely to be ameliorated over time. The occupiers of Garlands Farmhouse would experience a high magnitude of change due to the proximity of the site and its topography although the position of the public open space and new hedgerow planting along the Runsell Lane site frontage would ameliorate this to some degree.

49. From Runsell Green there is a view of the church tower and this is likely to be blocked by the proposed development. The magnitude of change for the observer is likely to be higher than the LVIA contemplates. Whilst the visual impacts would generally be localised that does not mean that they should be given less consideration. Overall I consider that the visual impact both in the short term and over a longer time period has been underestimated and that to many receptors the change would remain of major significance.

Valued landscape

50. Paragraph 109 of the Framework seeks, amongst other things, to protect and enhance valued landscapes. Whilst there is no further definition in either the Framework or Planning Practice Guidance it seeks to recognise that landscapes do not have to be designated to be important. Nevertheless, to benefit from this additional protection it seems clear that there should be attributes that take the landscape in question beyond mere countryside. The site was seemingly once within a Special Landscape Area. However, this does not, in my opinion, necessarily mean that it should be categorised as a valued landscape. This appears to have been a very widely used designation and there is no evidence to show what criteria were used to establish its boundaries.
51. The third edition to the *Guidelines for Landscape and Visual Impact Assessment* (GLVIA) provides some useful assistance by reference to a range of factors set out in Box 5.1. The site is generally of good landscape and scenic quality and is representative of the wider sweep of arable countryside to the north and east. Nevertheless, there are urban influences, including the settlement edge along Runsell View and Maldon Road. The site is generally representative of the Little Baddow and Danbury Wooded Farmland Landscape Character Area. However, it does not, in my opinion, contain any rare or distinguishing features that set it aside from other countryside with these characteristics. There is the small treed valley and stream but I would not judge this to be particularly unusual.
52. There is some historical interest as the site is part of the former landholding to Garlands Farmhouse. This forms part of the setting to the listed building, which also includes other fields to the north and east. I do not consider that the site is particularly important overall in terms of views towards Danbury church tower although it is in the foreground when looking in a westerly direction from Runsell Green. The land is not publicly accessible although it does contribute to the recreational enjoyment of people walking along Runsell Lane and Twitty Fee. In terms of tranquillity there is noise intrusion from the Maldon Road, especially within the southern parts of the site.
53. I am aware that valued landscapes have been considered in a number of appeal decisions. However, it seems to me that whether a site can be considered as such is largely a site-specific judgement. In this case the

landscape has medium landscape value but I do not consider that it comprises a valued landscape for the purposes of paragraph 109 of the Framework.

Conclusions

54. Although I do not consider the appeal site to be a valued landscape it is part of an attractive area of countryside that is not untypical of its landscape character area. Whilst woodlands, trees and hedges limit longer range views the open character and sloping landform of the site results in relatively high levels of mid-range inter-visibility. I consider that the appellant's LVIA has underestimated both the landscape and visual impacts and to my mind the appeal scheme would result in significant harm in terms of both. It would be contrary to policies CP5 and DC2 and would fail to recognise the intrinsic character and beauty of the countryside, which is a core planning principle of the Framework.

Other Matters

55. Following discussions with the appellant Essex County Council as Highway Authority is satisfied that there would be no adverse impact on the local highway network. The fourth reason for refusal was therefore no longer pursued by the council at the inquiry. Nevertheless, there was a great deal of local objection about the effect of the proposed development on the local highway network. I saw for myself in my visits to Danbury that the Maldon Road is a busy through route and I have no doubt that there is congestion, especially in peak periods. I was told that drivers cut through the lanes to avoid queuing traffic on the main road. These diversions include Runsell Lane, which is identified in the Danbury Planning Framework as suitable for Quiet Lane status.
56. Essex County Council is the responsible authority for the safety of the local highway network and I afford its views considerable weight. The Transport Assessment indicates that the relative increase in peak hour movements would be relatively small, taking account of committed developments. The traffic modelling indicated that there would be a marginal increase in delay and queueing at nearby junctions but this would be very small. Paragraph 32 of the Framework indicates that development should only be refused on transport grounds where residual cumulative impacts are severe. There is no evidence to support refusing the proposal on these grounds.
57. The Parish Council raised the issue of accidents within the vicinity of the site. However, from all the evidence I do not consider that this is a particularly dangerous stretch of road or that the traffic generation from the proposed development would be likely to lead to a material deterioration. The local highway authority preferred a single point of access onto Maldon Road and the proposal has been amended to take this into account. This would include a right turning lane into the site and sight lines to ensure a safe access into and out of the development.
58. Danbury has a number of shops and services, which the residents of the new development would be able to access on foot or bicycle. It is proposed to provide a new footway link from the northern corner of the site to Hopping Jacks Lane. Furthermore, the two nearest bus stops on Maldon Road would be upgraded to provide real-time information. A Travel Plan is also proposed to encourage new residents to use sustainable transport options. These

improvements would help improve accessibility. Overall I consider that the site is well located to allow new occupiers the opportunity to meet many of their day to day needs by modal choices other than the car.

Planning balance and whether the proposal would be sustainable development

59. Policy CP1 in the FR seeks to secure sustainable development. The appeal proposal would be contrary to the spatial strategy in policy CP2 of the CS and policies CP5 and DC2 in the FR relating to urban growth and the countryside. For the reasons I have given I consider these policies to be consistent with the Framework. However, the proposal would also be contrary to policy DC13 in the CS due to the likely harm to the SSSIs and policy DC18 due to its effect on the significance of Garlands Farmhouse. This latter policy is not consistent with paragraph 134 of the Framework and is therefore a relevant policy that is out-of-date. In such circumstances policy CP1 indicates that the tilted balance applies unless specific policies in the Framework indicate that development should be restricted. Paragraphs 118 and 134 are both restrictive policies that relate to SSSIs and listed buildings respectively. As I have already commented both require a balance to be made and if the harm outweighs the benefits then the Framework is clear that planning permission should be refused.

The benefits of the appeal scheme

60. Paragraph 7 of the Framework indicates that there are three dimensions to sustainable development. Paragraph 8 makes clear that these are mutually dependent and should not be taken in isolation. The council's housing requirement does not impose a cap. The provision of up to 140 dwellings would therefore be a benefit although its importance is diminished in view of the housing land supply position. Whilst housing has been undersupplied in the past this is recognised through the imposition of the 20% buffer, which brings forward land from later in the trajectory.
61. The scheme would also include 35% affordable homes in accordance with policy DC31 in the CS. There is no dispute that the need for such housing in the district is acute. Affordable homes will be provided as part of the overall supply of market housing over the next five years. However, not every site will be able to do so and, in any event, the provision of affordable homes should not be seen in terms of maximum numbers. In the circumstances the proposed provision would be an important benefit.
62. There would also be a number of economic advantages, including new jobs during the construction phase and thereafter. The new population would also contribute to the local economy and help support local facilities and services. I have already indicated that the site is in a sustainable location so that new residents could take the opportunity to travel by modes other than the car for some of their journeys. The upgrading of the nearest bus stops and the new section of footway along Runsell Lane would be provided to meet the needs of the development but would also benefit the wider community. Whilst the development would result in the payment of the Community Infrastructure Levy this is generally intended to mitigate the impacts of development. I do not therefore regard it as a benefit as such. It is difficult to attribute positive weight to the New Homes Bonus without knowing the extent to which there would be specific advantage to the local community.

63. There is no reason to doubt that this would be a development of good quality within an attractive landscaped setting and that the new homes would be built to a high standard, including in terms of energy efficiency. There would also be opportunities to improve the biodiversity of the site. These are all positive factors that weigh significantly in favour of the appeal development.

The heritage balance under paragraph 134 of the Framework

64. The appeal proposal would lead to less than substantial harm to the significance of Garlands Farmhouse. I have concluded that this is not of a minor nature but that in any event there is no spectrum in either the Framework or the Planning Practice Guidance. I acknowledge that Garlands Farmhouse is a Grade II listed building and that there would not be substantial harm or total loss of significance. Nevertheless, the Framework makes clear that heritage assets are irreplaceable and that any harm should require clear and convincing justification. In this case there are benefits of the scheme and collectively I consider that they should be attributed significant weight in the planning balance. Nevertheless, the desirability of preserving the setting of the listed building should be given considerable importance and weight. In my judgement the harm that I have identified to the significance of Garlands Farmhouse would clearly outweigh the benefits that would ensue in this case.

The natural environment balance under paragraph 118 of the Framework

65. For all of the reasons I have given, the appeal proposal would be likely to have an adverse effect on the special interest features of the nearby SSSIs. I have taken account of my obligations under the 1981 Wildlife and Countryside Act and I afford the advice of NE in this respect substantial weight. Whilst the benefits that I have outlined above would be significant they would not be sufficient to clearly outweigh the harmful impacts that would be likely to ensue as a result of recreational pressure arising from the proposed development.

Overall conclusion

66. In the aforementioned circumstances Paragraphs 118 and 134 of the Framework make clear that planning permission should be refused. Whilst it is thus unnecessary to return to the tilted balance I have also concluded that the proposal would have an adverse effect on the intrinsic character and beauty of the countryside and would fail to accord with the spatial strategy in the development plan. If the tilted balance were to be applied I have no doubt that the adverse impacts would significantly and demonstrably outweigh the benefits in this case.

67. The appeal proposal would thus conflict with policy CP1 in the FR and the development plan overall. There are no material considerations of sufficient weight or importance to indicate that the decision should be made other than in accordance with that plan. In such circumstances this would not be a sustainable form of development and there is no presumption in its favour. The appeal does not therefore succeed.

Christina Downes

INSPECTOR

APPEARANCES

FOR THE LOCAL PLANNING AUTHORITY:

Mr Josef Cannon	Of Counsel, instructed by the Solicitor to Chelmsford City Council
<i>He called:</i>	
Mr M Hurst BSc(hons) MSc MRICS IHBC	Senior Conservation Officer, Chelmsford City Council
Mrs K Howard BSc(Hons)	Natural Environment Officer, Chelmsford City Council
Mr M Flatman BA(Hons) DipLA CMLI	Director of Liz Lake Associates
Mr J Potter BSc(Hons) MA MRTPI	Planning & Strategic Housing Policy Manager, Chelmsford City Council
Ms S Rogers BSc(Hons) MA MRTPI	Senior Planning Officer, Chelmsford City Council
*Mr R Hosegood BSc MRTPI	Strategic Development Manager, Chelmsford City Council

FOR THE APPELLANT:

Mr Jonathan Easton	Of Counsel, instructed by Gladman Developments Ltd
<i>He called:</i>	
Mr C Burbridge BSc(Hons) MSc MRTPI MCIT MCILT	Director of Icen Projects Ltd
Mr G Holliday BA(Hons) DipLA MPhil CMLI	Director of FPCR Environment and Design Ltd
Mr T Goodwin BSc (Hons) MSc MIEnvSc MCIEEM MIALE	Director of Ecology Solutions
Mr J Tait BA(Hons) DipTP MRTPI	Director of Planning Prospects Ltd
*Mr I Beamon BSc(Hons) MRICS	Project Manager, Gladman Developments Ltd

**Participants of the conditions and Planning Obligation sessions only*

INTERESTED PERSONS:

Mr M Schofield	Chair of the local community action group, Hands Off Danbury
Councillor D Carlin	Vice Chair of Danbury Parish Council

DOCUMENTS

- 1 Statement of Common Ground on highway matters between Essex County Council and the appellant
- 2 Procedural note on vehicular access submitted by Mr Easton
- 3 Mr Goodwin's note on further consultation responses from

- Natural England
- 4 Appeal decision: Land at Maldon Road, Danbury (APP/W1525/W/17/3178243)
- 5 Statement read to the inquiry by Councillor Carlin
- 6 Appeal decision: land adj to 34 Broom Road, Lakenheath (APP/H3510/W/16/3149242), submitted by Mr Cannon
- 7 Letter from National Trust to Chelmsford City Council (30 January 2018), submitted by Mr Cannon
- 8 Tables of the council's five year housing land supply, submitted by Mr Cannon
- 9 Email from Mrs Howard to NE (17 January 2018), submitted by Mr Cannon
- 10 Representations of Hands off Danbury, submitted by Mr Schofield
- 11 Statement of Common Ground on affordable housing between the council and appellant
- 12A *Daventry District Council v Secretary of State for Communities and Local Government and Gladman Developments Ltd* [2015] EWHC 3459 (Admin)
- 12B *Daventry District Council v Secretary of State for Communities and Local Government and Gladman Developments Ltd* [2016] EWCA Civ 1146
- 13 Accident data (2012-2017), submitted by Mr Burbridge
- 14 Email containing definitions of NE condition categories for SSSIs, submitted by Mr Goodwin (30 January 2018)
- 15 Objection to the proposed development from Strutt and Parker on behalf of Hill (31 January 2018)
- 16 Extract from the agricultural classifications map, submitted by Mr Tait
- 17 CIL compliance schedule, submitted by Mr Cannon
- 18 Photographs of Hatfield Peverel station car park, submitted by Mr Burbridge
- 19 Location of SSSI car parks and routes, submitted by Mrs Howard
- 20 Copy of the register of title for the appeal site, submitted by Mr Easton
- 21 Certified copy of the executed Planning Obligation by Unilateral Undertaking, dated 20 February 2018
- 22 Agreed list of planning conditions

PLANS

- A Application plans
- B Illustrative Development Framework Plan
- C Plan showing pedestrian access onto Runsell Lane