



Planning Policy
Directorate for Sustainable Communities
Chelmsford City Council
Civic Centre, Duke Street
Chelmsford
CM1 1JE

Date: 17 August 2015

Dear Sir/Madam

RE: Chelmsford City Council Duty to Co-operate Scoping Report consultation

Thank you for the opportunity to comment on the Chelmsford City Council Duty to Co-operate Scoping Report. The response of Brentwood Borough Council is set out below, although please note that it has not been possible to gain approval from Councillors before your deadline. This is to go before our Planning & Licensing Committee on Tuesday 2 September 2015 recommending that the below response be approved.

While we understand the urgency to prepare a Local Plan, we would like to raise the issue of ending a consultation in August, particularly in light of the targeted nature of those invited to respond – predominantly local planning authorities. Most authorities operate a recess period for August and so we suspect Brentwood Council is not alone in having to submit a response that cannot be approved by Councillors until after the deadline.

In terms of general observations, we are supportive of the approach Chelmsford City Council has taken with regard to the scope of the consultation document. In particular we welcome setting out co-operation methods to engage with relevant authorities/bodies on each of the strategic matters identified.

Question 1: *Do you agree that the correct cross-boundary strategic matters have been identified?*

Yes – The scoping report identifies a comprehensive list of relevant strategic matters. We are pleased to note that Paragraph 28 commits that the list of strategic matters and co-operation activities will be kept under review. This allows for new strategic matters to be considered should they be identified following this Scoping Report consultation, which we support.

Question 2: *Do you agree that the Council has identified the correct relevant authorities and bodies to co-operate with on each strategic matter?*

Yes – The report appears to address all of the relevant authorities and bodies as prescribed in legislation.

Question 3: *Do you agree with the proposed co-operation methods for considering / addressing strategic matters?*

Yes – Brentwood Borough Council considers Chelmsford City Council has identified the relevant processes and mechanisms to ensure effective engagement and address strategic matters.

Question 4: *Do you have any suggestions for how the Council could encourage co-operation on cross boundary strategic matters?*

Brentwood Borough Council considers the proposed-operation methods to be sufficiently comprehensive.

Question 5: *Has the City Council identified the strategic cross boundary housing and Traveller matters, the correct bodies for engagement and are the proposed methods for co-operation the most appropriate?*

Yes - The scoping report identifies the strategic cross boundary housing and Traveller matters, the correct bodies for engagement and the relevant processes and mechanisms to ensure effective engagement.

We support the City Council's intention in seeking to meet its objectively assessed needs for housing and Travellers within the next Local Plan.

Paragraph 32: We would suggest amendment to read "The Council has also held one-to-one meetings with all neighbouring authorities, none of which are presently indicating that they need Chelmsford to accommodate any of their future housing" allowing for the potential for this position to change following this Scoping Report consultation.

Question 6: *Has the City Council identified the strategic cross boundary employment matters, the correct bodies for engagement and are the proposed methods for co-operation the most appropriate?*

Yes - The scoping report identifies the strategic cross boundary employment matters, the correct bodies for engagement and the relevant processes and mechanisms to ensure effective engagement.

We support the City Council's intention in seeking to meet its objectively assessed needs for employment within the next Local Plan.

Paragraph 41: We would suggest amending to read "Initial discussions with all adjoining authorities indicate that presently no neighbouring Council requires Chelmsford to accommodate any of their future employment land or jobs growth" allowing for the potential for this position to change following this Scoping Report consultation.

Question 7: *Has the City Council identified the strategic cross boundary infrastructure matters, the correct bodies for engagement and are the proposed methods for co-operation the most appropriate?*

Yes - The scoping report identifies the strategic cross boundary infrastructure matters, the correct bodies for engagement and the relevant processes and mechanisms to ensure effective engagement.

We are pleased to note that Paragraph 49 considers the need for improvements to the strategic road network including the A12. Given the potential cumulative impact of proposed development along the A12 through Essex, Brentwood Borough Council welcomes the opportunity to work together with Chelmsford City Council and other partners to deliver strategic road network improvements. The potential for increased vehicle movements on the A12 from cumulative development is likely to result in more vehicles accessing the M25 at A12 junction 11 / M25 junction 28 (Brook Street Roundabout, Brentwood). Joint working is required to achieve necessary improvements.

Question 8: *Has the City Council identified the strategic cross boundary retail matters, the correct bodies for engagement and are the proposed methods for co-operation the most appropriate?*

Yes - The scoping report identifies the strategic cross boundary retail matters, the correct bodies for engagement and the relevant processes and mechanisms to ensure effective engagement.

Question 9: *Has the City Council identified the strategic cross boundary leisure related matters, the correct bodies for engagement and are the proposed methods for co-operation the most appropriate?*

Yes - The scoping report identifies the strategic cross boundary leisure related matters, the correct bodies for engagement and the relevant processes and mechanisms to ensure effective engagement.

Question 10: *Are there likely to be any strategic cross boundary issues related to water supply and waste water? If so, who should they be discussed with and through what means?*

The Brentwood Borough Council Water Cycle Study (February 2011) identifies waste water treatment capacity issues in the north of Brentwood Borough. Given the shared local authority boundary in this area we would not like to discount the potential for cross boundary implications in relation to the need for new/improved water related infrastructure. We would like to ensure that water supply and waste water matters be kept under review, which seems sensible given awaited outcomes and recommendations from the City Council's new Water Cycle Study.

Question 11: *Are there likely to be any strategic cross boundary issues related to flooding? If so, who should they be discussed with and through what means?*

Whilst we support the section on flooding and welcome the fact the Chelmsford Flood Alleviation Scheme (SFRA) will reduce the risk of flooding locally, we would not like to discount the potential for cross boundary implications along the shared local authority boundary. The Borough Council's 'Scoping and Outline Water Cycle Study' (January 2011), identifies the potential for neighboring impacts on and from Brentwood Borough and whilst strategic cross boundary issues in this respect are unlikely we would like to ensure this will be kept under review.

Paragraph 65: We suggest rewording to include reference to discussions with Essex County Council, as Lead Flood Risk Authority, as well as with the Environment Agency.

Question 12: *Are there likely to be any strategic cross boundary issues related to the Green Belt? If so, who should they be discussed with and through what means?*

It is noted that the City Council's evidence indicates that sufficient land could be identified outside of the Green Belt to meet Chelmsford's future housing needs.

Question 13: *Are there likely to be any strategic cross boundary issues related to climate change, mitigation and adaption? If so, who should they be discussed with and through what means?*

No – Although we echo the need for this to be kept under review.

Question 14: *Are there likely to be any strategic cross boundary issues related to the natural environment and landscape? If so, who should they be discussed with and through what means?*

Given the shared local authority boundary and the fact that closely adjacent Local Wildlife Sites occur between Brentwood and Chelmsford local authority areas, we would not like to discount the potential for cross boundary implications in relation to the natural environment and landscape.

The need for both local authorities to consider, and where possible feed into each respective Green Infrastructure Study is highlighted, together with continued discussion in relation to the potential impact of strategic development proposals on matters concerning the natural environment and landscape.

Question 15: *Are there likely to be any strategic cross boundary issues related to heritage? If so, who should they be discussed with and through what means?*

No – Although we echo the need for this to be kept under review.

We look forward to continuing to work with the City Council where relevant as each respective authority progresses its Local Plan.

I trust that the response is of assistance but should you have any queries please contact the Planning Policy Team using the details below.

Yours sincerely



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