

Chelmsford Local Plan – Chelmsford City Council response to Site Status Schedules (EX 038, EX 039) from Grosvenor Developments Ltd and Hammonds Estates LLP

Introduction

1. This document is submitted by Chelmsford City Council to the Chelmsford Local Plan Examination Inspector, in response to submissions made by Grosvenor Developments Ltd and Hammonds Estates LLP (GDHE):
EX 038 Site Schedule: Growth Area 1 Non-Developable Sites
EX 039 Site Schedule: Housing Supply Reductions
2. These two documents were submitted to the Inspector on the penultimate day of hearing sessions (13 December 2018); and accepted by the Inspector for publication and response by Chelmsford City Council (the Council) on 8 January 2019.

Context

3. It is the Council's position that all site allocations are justified and deliverable, and that there are no issues of soundness that would result in them not being able to be allocated for development.
4. The Council has carefully selected the Local Plan site allocations taking a number of factors into account such as the need for sustainable development, constraints, site capacities, and wider infrastructure needs. This has informed the delivery trajectory. The Council's overall approach to delivery is consistent throughout the allocations, which has been tested through the Viability Study.
5. It should be noted that references in EX 038 are based on the 2015 Viability Study (EB 072A). This was superseded in January 2018 with an updated Local Plan Viability Study (EB 082A). This Study considered the overall cumulative impact of the Local Plan allocations and policies in accordance with the 2012 NPPF, against which the Local Plan is being assessed, the 2014 PPG, the Harman Guidance, and consultation with the development industry. For all the sites listed in EX 038 and EX 039 the Viability Study concluded that development was likely to be viable; therefore, comments in EX 038 on viability of these sites should be discounted.
6. All the sites listed in EX 038 and EX 039 are developable in accordance with the 2012 and 2018 National Planning Policy Framework (NPPF). Footnote 12 of the 2012 NPPF and Annex 2 of the 2018 NPPF state that to be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged. The delivery trajectory is realistic and there is every reasonable prospect of sites being developed in accordance with the housing trajectory set out.

7. In some cases, there have been informal discussions between planning officers and site promoters, which remain confidential at this stage and are not in the public domain due to commercial sensitivity.
8. The sites in Table 1 (below) are allocated sites which GDHE assert should be removed from the housing trajectory. However, these sites projected to come forwards from year 6 in the trajectory, outside the 5-year housing supply period. Delivery will be monitored through the Authority Monitoring Report, and in accordance with Section 10 of the Local Plan.
9. The sites in Table 2 are not allocated in the Local Plan, but are small sites listed in the Council's Housing Sites Schedule (EB 063A). Note that the reference numbers in Table 2 correct the numbers as listed in EX 039. If for any reason these consented schemes do not come forwards, the impact on the overall housing number in the Local Plan would be minimal (a total of 25 units).
10. The sites in Table 3 are allocations where GDHE assert that delivery is uncertain. The responses to the points made are contained in the table, and delivery will be monitored as set out at Paragraph 8.
11. Furthermore, in accordance with Local Plan Policy S15 – Monitoring and Review, a review of the Local Plan will commence three years after its adoption. This monitoring will allow the Council to react quickly and effectively in respect of any change in circumstances, to ensure a sufficient supply of housing sites is maintained.

Conclusion

12. The Council has undertaken a thorough and consistent approach to assessing the suitability and deliverability of allocated sites. None of the contested allocated sites are programmed for delivery in the first five years, and there is no evidence provided by Grosvenor Developments Ltd and Hammonds Estates LLP that makes their prospect of development unreasonable, which is the test in Footnote 12 of the 2012 NPPF and in Appendix 2 of the 2018 NPPF.

Table 1: Local Plan Allocated Sites

Site Ref	Name	Grosvenor/Hammonds Site Schedule	Number of units	Reason for inclusion	Trajectory
CW1e	Travis Perkins, Navigation Road	EX 038 EX 039	75	Part of wider site (0.4ha) was developed in 2013. Potential for development in an area for regeneration at Chelmer Waterside. £5.7 million HIF funding agreed in principle for improved access to Chelmer Waterside area. Typology superseded by EB 082A – site considered viable. CCC in correspondence with landowners about site allocation in 2016. Site discussed at Matter 6a Hearing Session.	Year 6-10
CW1f	Navigation Road Sites	EX 038 EX 039	35	Potential for development of a gateway site in the Chelmer Waterside regeneration area, and to make best use of under-used land for sustainable development. £5.7 million HIF funding agreed in principle for improved access to Chelmer Waterside area. Typology superseded by EB 082A – site considered viable. CCC in correspondence with landowners in 2016. No oral evidence provided by GDHE at Hearing Sessions.	Year 11-15
SGS1g	Civic Centre Land, Fairfield Road	EX 038 EX 039	100	In Council ownership. Willing landowner, submitted to SLAA in 2014 (CFS241). Longer term plan pending rationalisation of existing building uses and parking areas.	Year 11-15

Site Ref	Name	Grosvenor/Hammonds Site Schedule	Number of units	Reason for inclusion	Trajectory
				Typology superseded by EB 082A – site considered viable. No oral evidence provided by GDHE at Hearing Sessions.	
GS1k	Rectory Lane Car Park West	EX 038 EX 039	75	In Council ownership. Close to Anglia Ruskin University - interest expressed for development as student accommodation. Site discussed at Matter 6a Hearing Session.	Year 6-10
GS1l	Car Park West of County Hotel, Rainsford Road	EX 038	45	Planning application submitted for 49 retirement living apartments, communal facilities, parking (17/01899/FUL), at consultation stage. Existing use is private, not public, car parking. No oral evidence provided by GDHE at Hearing Sessions.	Year 6-10
GS1m	Former Chelmsford Electrical and Car Wash, Brook St.	EX 038 EX 039	40	Potential for development in an area for regeneration, and to make best use of under-used land for sustainable development. Typology superseded by EB 082A – site considered viable. CCC in correspondence with landowners in 2016. No oral evidence provided by GDHE at Hearing Sessions.	Year 6-10
GS1n	BT Telephone Exchange, Cottage Place	EX 038 EX 039	30	Potential for development in an area for regeneration, and to make best use of under-used land for sustainable development.	Year 11-15

Site Ref	Name	Grosvenor/Hammonds Site Schedule	Number of units	Reason for inclusion	Trajectory
				Typology superseded by EB 082A – site considered viable. CCC in correspondence with landowner in 2015. No oral evidence provided by GDHE at Hearing Sessions.	
GS1o	Rectory Lane Car Park East	EX 038 EX 039	25	In Council ownership. Close to Anglia Ruskin University - interest expressed for development as student accommodation. Site discussed at Matter 6a Hearing Session.	Year 11-15
GS1r	British Legion, New London Road	EX 038 EX 039	15	Discussion with landowner, 2018. Typology superseded by EB 082A – site considered viable. Site discussed at Matter 6a Hearing Session.	Year 6-10
GS1v	Car Park r/o Bellamy Court, Broomfield Road	EX 038 EX 039	10	To make best use of under-used land for sustainable development. Typology superseded by EB 082A – site considered viable. CCC in correspondence with landowners in 2016. No oral evidence provided by GDHE at Hearing Sessions.	Year 6-10
EC2	Land Surrounding Telephone Exchange, Writtle	EX 039	25	To make best use of vacant land for sustainable development. Site re-allocated from Site Allocations Document DPD.	Year 11-15

Site Ref	Name	Grosvenor/Hammonds Site Schedule	Number of units	Reason for inclusion	Trajectory
EC5	St Giles, Bicknacre	EX 039	32	To make best use of vacant land for sustainable development. Site re-allocated from Site Allocations Document DPD.	Year 6-10

Table 2: Unallocated Sites in CCC Housing Site Schedule (EB063A)

Site Ref	Name	Grosvenor/Hammonds Site Schedule	Number of units	Reason for inclusion	Trajectory
106 in CCC Site Schedule	185 New London Road, Chelmsford	EX 039	5	Alternative proposal approved for non-residential use would result in reduction of 5 units if implemented.	Year 2
132 in CCC Site Schedule	86 Main Road, Danbury	EX 039	9	Active pre-application discussions late 2018. Previous planning permission granted 15/01117/FUL.	Year 2
36 in CCC Site Schedule	Moulsham Home, 116-117 Moulsham Street	EX 039	10	Planning permission granted for extension to existing care home for 14 bedrooms. Follows the Council's methodology to convert bed-spaces into dwelling equivalents (EX 025 Housing Implementation Strategy, Para 4.12-4.15).	Year 3

Table 3: Sites proposed by EX 039 for a reduction in unit numbers

Site Ref	Name	Grosvenor/Hammonds Site Schedule	Number of units	Reason for inclusion	Trajectory
SGS4	North East Chelmsford; Channels; Beaulieu	EX 039	3,000	Delivery rates discussed at Matter 6b Hearing Session. Appendix B of EX 017, and EB 063c, show that projections are robust and based on an assessment of the number of outlets proposed. Delivery rates and timeframe also set out in Statements of Common Ground agreed with promoters (SOCG15, SOCG21).	Year 5-17
SGS5a	Great Leighs – Land at Moulsham Hall	EX 039	750	Discussed at Matter 6b Hearing Session. Minerals Resource Assessment under consideration by the Minerals Planning Authority. Statements of Common Ground agreed with promoters (SOCG16A, SOCG16B).	Year 6-17
SGS6	North of Broomfield	EX 039	450	Discussed at Matter 6b Hearing Session. Minerals Resource Assessment under consideration by the Minerals Planning Authority. Statement of Common Ground agreed with promoters (SOCG19).	Year 4-10