
EXAMINATION STATEMENT – MATTER 5

Chelmsford Local Plan

Representations on behalf of
Redrow Homes
(ID: 927695)

November 2018

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CHELMSFORD LOCAL PLAN

**REPRESENTATIONS ON BEHALF OF
REDROW HOMES (ID: 927695)**

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Prepared by:	James Finn
Checked by:	Huw Edwards
Authorised by:	Huw Edwards

Barton Willmore
The Observatory
Southfleet Road
Ebbsfleet
Dartford
Kent
DA10 0DF

Tel: 01322 374660
Email: james.finn@bartonwillmore.co.uk

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1.0 INTRODUCTION

1.1 This Statement has been prepared by Barton Willmore LLP on behalf of our Client, Redrow Homes, who has an interest in the land to the east of Great Baddow and west of the A12 that forms the following emerging strategic allocations at proposed Growth Area 1 “Central and Urban Chelmsford” (Location 3) in the draft Local Plan:

- Strategic Growth Site 3b - Land North of Maldon Road (employment site);
- Strategic Growth Site 3c - Land South of Maldon Road (residential site); and,
- Strategic Growth Site 3d - Land North of Maldon Road (residential site).

1.2 Representations have been made on behalf of our Client throughout the production of the Local Plan. Our representations to the Regulation 19 Pre-Submission draft Local Plan related to the above proposed allocations as well as additional land at and to the east of Growth Site 3c and west of the A12 (labelled as ‘Site 3e’ in our representations). The representations included a Development Vision Document to explain the masterplan and vision for this land to create an attractive and sustainable new neighbourhood.

1.3 Notwithstanding the land interests of our Client, these representations have been prepared in recognition of prevailing planning policy and guidance, in particular the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG).

1.4 The Local Plan was submitted prior to the revised 2018 NPPF and is therefore being examined under the 2012 NPPF. Reference is therefore made to the 2012 NPPF in responses to the Inspector’s questions, unless otherwise stated. These representations respond to the Inspector’s questions within Matter 5 and have been considered in the context of the tests of ‘Soundness’ as set out at Para 182 of the NPPF which requires that a Plan is:

- **Positively Prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where reasonable;
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternative, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities;
- **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.

2.0 RESPONSE TO MATTER 5 – SPATIAL STRATEGY

Main Issue: Whether the spatial strategy and overall distribution of development has been positively prepared and is justified by a robust and credible evidence base.

Question 28. Does the proposed settlement hierarchy reflect the role and function of different settlements and is it justified by robust and up-to-date evidence?

Should the hierarchy include smaller settlements (smaller villages and hamlets) within the Plan area? Would this approach be effective, justified and consistent with national policy?

- 2.1 We support the proposed settlement hierarchy and consider that this approach aligns with the Local Plan Vision and Spatial Principles to focus new development at the most sustainable locations and according to their size, function and characteristics (Local Plan para. 6.32).
- 2.2 This approach is supported by up-to-date and robust evidence contained within the latest Village Service Audit provided at Appendix 2 of the January 2018 Urban Area and Defined Settlement Boundary Review Updated Technical Note (EN083B).
- 2.3 We also support the identification of Chelmsford as a top tier Category 1 settlement, given it is the most sustainable principal settlement that contains the most functions, services, employment opportunities, facilities and transport connections to accommodate additional growth.
- 2.4 We support the way in which the draft Local Plan (SD01) proposes additional growth at Growth Area 1 “Central and Urban Chelmsford” (location 3) and particularly at Strategic Growth Site 3b, c and d.
- 2.5 As highlighted in the draft Local Plan, additional growth at Chelmsford Growth Area 1 (location 3) will facilitate “...its renewal as an important centre for employment, shopping, public services, leisure and cultural facilities” (para. 6.37).

Question 29. How have settlement boundaries been defined and are they justified, effective and based on robust evidence?

- 2.6 We have no comment on the boundaries defined for the existing settlements but will comment on the settlement boundary for the proposed Strategic Growth Site 3b, c and d in our response to Matter 6a.

Question 30. Were alternative options for the distribution of development considered during the Plan's preparation and were they subject to SA? Is it clear why alternative spatial strategies were discounted? (Also refer to Matter 1)

- 2.7 As set out in our response to Matter 1, in our view the SA has considered various spatial options for distributing housing and employment growth, with a range of options presented including focussing on the urban areas, key transport corridors and growth in key villages.
- 2.8 However, in our response to Matter 6a we will comment on the Council's assessment in the SA of our Client's land interest at 'Land East of Brick Kiln Road North of Woodhill Road Sandon' (ref. CFS 99) and 'Land North of and South of Sandon School' (ref. CFS 100). In particular, that we consider the SA has not adequately taken into account how this land could be sustainably and comprehensively master planned with the proposed allocation Sites 3b, 3c and 3d in a way that would deliver greater benefits and an even more positive contribution to achieving the Local Plan's vision.

Question 31. Is the focus of development within the 3 Growth Areas soundly based and supported by robust evidence? Is there an over-reliance on strategic sites within these locations?

- 2.9 We support the proposed focussing of development within Growth Area 1, particularly at Strategic Growth Site 3b, c and d.
- 2.10 We consider this approach to be soundly based and supported by the evidence, taking into account constraints relating to Green Belt and Green Wedges to the south and west of the City area, which spatially leaves the North-East and East Chelmsford as the optimum locations for growth.
- 2.11 Regarding whether there is an over reliance of strategic sites (i.e. above 100 units, as defined by Table 3) in Growth Area 1, in our view this Growth Area contains a mix of both strategic and smaller sites.
- 2.12 We would also highlight that Redrow's firm ambition is to deliver the development envisaged by Strategic Growth Site 3b, c and d at the earliest opportunity and we can confirm that the rates assumed in the draft Local Plan Development Trajectory (Draft Local Plan (SD001, Appendix C) are readily achievable.

Question 35. The strategy states that strategic employment growth will be directed to strategic site allocations at North East Chelmsford and East Chelmsford. Is this approach justified and based on robust and credible evidence?

- 2.13 We support the draft Local Plan directing strategic employment growth to the sustainably located strategic site allocations at North East Chelmsford and East Chelmsford. We consider this to be justified by the evidence base including the Chelmsford City Centre Office Market Review (EB078), the Chelmsford Retail Study Update (EB077), the Employment Land Review (EB073), the Chelmsford Economic Strategy (EB075) and the Delivering Economic Growth in Chelmsford to 2036 reports (EB076 and EB080).
- 2.14 We will comment on the proposed employment allocation at Strategic Growth Site 3b in our response to Matter 7.

Question 37. Is the reference to phasing of development according to deliverability and identified need within the policy, justified and consistent with national policy?

- 2.15 Draft Policy S9 provides that new development will be phased according to deliverability and identified need to support a five-year rolling supply of specific deliverable housing sites and to ensure the timely provision of new infrastructure. Supporting para. 6.43 adds that the delivery and phasing of development sites is set out in the Development Trajectories at Appendix C.
- 2.16 The policy and its supporting text should be clear that site could come forward sooner than that set out in the Development Trajectory where they are not reliant on the delivery of wider infrastructure requirements coming forward first.
- 2.17 Such an approach would be consistent with national policy to significantly boosting the supply of housing (NPPF para. 47), nor NPPF para. 14 (second bullet) that requires Local Plans to have sufficient flexibility to respond to rapid change.

Question 38. The policy refers to 'Strategic Growth Sites'. Are these clearly defined in the supporting text or should reference be made to Table 3 in the Plan to aid clarity?

- 2.18 While the Council's Schedule of Additional a Changes (SD002) under AC35 proposes to add text to end of para 6.36 listing the Strategic Growth Sites, we consider that it would aid clarity if the supporting text could also refer to Table 3 in the Plan.

Question 40. Overall is the spatial strategy within the Plan justified? In particular:

- a) Does it identify an appropriate balance between providing for economic development and new homes, supporting the role of the settlements and having regard to the effect on such factors as climate change, agricultural land, the environment, the transport network and other infrastructure and local services and facilities?**
- b) Will it achieve the Council's vision, does it meet the strategic priorities and spatial principles, and will it deliver sustainable development in accordance with national policy?**

- 2.19 The Sustainability Appraisal (SA) (SD004) has concluded that the majority of the SA objectives will experience positive effects as a result of the implementation of the policies and proposals contained in the Pre-Submission Local Plan (para 6.1.16). Moreover, that whilst negative effects have also been identified against many of the SA objectives, the Pre-Submission Local Plan includes policies which seek to manage these effects such that significant adverse effects will be largely avoided (para 6.1.16).
- 2.20 Overall, we therefore consider that the spatial strategy within the plan is justified and strikes the right balance between providing for new homes and jobs and social, economic and environmental effects. We consider that it will deliver sustainable development in accordance with national policy.
- 2.21 We also consider that the spatial strategy will achieve the Council's vision set out in Section 4 of the draft Local Plan, and we fully support the way in which it proposes to focus new housing and employment growth to the most sustainable locations including through the delivery of sustainable urban extensions around Chelmsford.
- 2.22 As part of achieving the Council's vision, we fully support the identification of the land to the East of Chelmsford as a Growth Area, which given its relatively unconstrained nature, can play a key role in helping to meet the strategic housing and employment requirements of the Plan.
- 2.23 However, as will be explained in our comments to Matters 6a and 7, we consider that the ability to achieve the Council's vision would be optimised if its spatial strategy for Strategic Growth Sites 3b, 3c and 3d also included the additional available, deliverable and unconstrained land to the east of Growth Site 3c and west of the A12 (labelled as 'Site 3e' in our representations). As demonstrated in the Development Vision Document submitted to the Regulation 19 Pre-Submission draft Local Plan consultation, the inclusion of this additional land could be sustainably and comprehensively master planned with the proposed allocation Sites 3b, 3c and

3d in a way that would deliver greater benefits and an even more positive contribution towards achieving the Local Plan's vision.