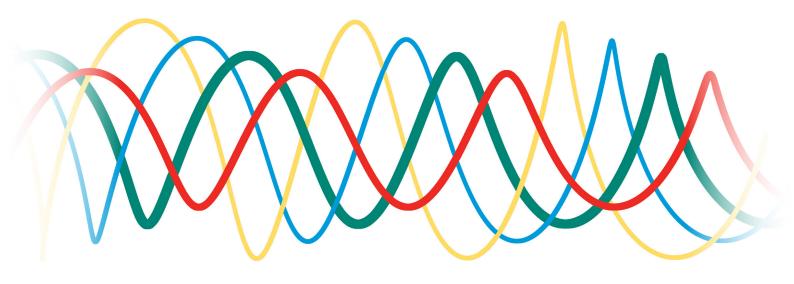
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INDEPENDENT EXAMINATION OF THE CHELMSFORD DRAFT LOCAL PLAN

ID 872955

MATTER 6C

HOUSING PROVISION IN GROWTH AREA 3
SOUTH AND EAST CHELMSFORD



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Matter 6c - Housing Provision in Growth Area 3 – South and East Chelmsford

On behalf of Grosvenor Developments Limited ('Grosvenor') and Hammonds Estates LLP ('Hammonds Estates') who are development partner and landowner of Hammonds Farm respectively ('the promoters'), the following information is provided in regard to Matter 6c – Housing Provision in Growth Area 3 – South and East Chelmsford and relevant issues raised by the Local Plan Inspector to inform the forthcoming Local Plan Examination.

Main issue – Whether the supply of housing development in Growth Area 3 – South and East Chelmsford (GA3) is sound

- Qu.66 Are the housing site allocations in GA3 within Location 7: North of South Woodham Ferrers, Location 8: Bicknacre and Location 9: Danbury, justified and deliverable and are they consistent with the Plan's spatial principles (Strategic Policy S1) and national policy? In particular:
 - a. Is the scale of housing for each site allocation, particularly the large Strategic Growth Site North of South Woodham Ferrers, justified having regard to any constraints, existing local infrastructure and the provision of necessary additional infrastructure?
 - b. Is the housing trajectory realistic and are there any sites which might not be delivered in accordance with the timescale set?
 - c. Are the planning and masterplanning principles justified?
 - d. Are the specific development and site infrastructure requirements clearly identified for each site allocation, are they necessary and are they justified by robust evidence? Is any other infrastructure necessary for site delivery?
 - e. Are the site boundaries justified?
 - f. Will the site allocations in these locations achieve sustainable development?
 - g. Are any amendments necessary to ensure soundness?
- 6c.1 Although categorized as a high level settlement (town), South Woodham Ferrers is some distance from Chelmsford, with relatively poor road and public transport connections. Consequently, there is reliance on the use of private transport to access facilities and services beyond South Woodham Ferrers. This is confirmed by journey to work census data¹. Given the level of housing proposed and the modest level of employment provision, this pattern of use will result in non-sustainable transport modes continuing to be used, unless a significant modal shift can be achieved.

Terence O'Rourke Ltd 2018

¹ Table WU03EW - Location of usual residence and place of work by method of travel to work (MSOA level) – Residential MSOAs Chelmsford 019 and Chelmsford 020 - www.nomisweb.co.uk

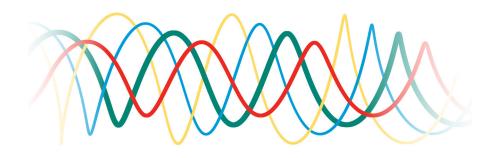
- 6c.2 The policy for North of South Woodham Ferrers identifies the need for improvements to the local and strategic highway network within Strategic Policy S11, specifically identifying capacity improvements to the A132 between Rettendon Turnpike and South Woodham Ferrers, including necessary junction improvements, which are to be brought forward as early as possible.
- Oualling of the A132 was included in all of the spatial options testing (EB023) and sensitivity option testing (EB024) and also within the initial assessment of the preferred option (EB025). Transport evidence that follows (local modelling of junctions for preferred and pre-submission options (EB026, EB029) is not explicit whether the A132 dualling is or isn't assumed within the model. Whilst it states that assumptions on infrastructure have maintained consistency with the preferred option testing there is no clarity as to whether dualling of the A132 is or isn't included or required. The Policy for South Woodham Ferrers makes no reference to dualling, only junction improvements. The evidence supporting the plan is unclear and the plan is unsound.
- 6c.4 Paragraph 7.184 of the Local Plan Preferred Options (EB116) referred to the need for the proposed allocation to investigate potential for and contributions to additional train capacity, station improvements and, in the longer term, opportunities for a passing loop to enable more frequent trains. This paragraph has been removed from the Pre-submission Plan (PSP) and thus there is no requirement to seek improvements to rail travel, as an alternative to use of private car.
- Paragraph 7.337 of the supporting text states that due to existing features such as roads and land topography, it is likely that development will come forward within western, central and eastern parcels. However, as illustrated on page 38 of the Hammonds Estates' representation (PS1045), there are extensive on-site constraints to development in the western part of the site because of the presence of overhead pylons, a high pressure gas main and a high risk of surface water flooding, which will limit the extent of land available for development.
- 6c.6 The Housing Trajectory (SD02) identifies that North of South Woodham Ferrers will deliver housing from 2021/22 onwards. Given that the PSP is unlikely to be adopted until spring 2019, the lead-in time necessary for public consultation, preparation of a masterplans, submission and approval of planning applications (outline as well as reserved matters), discharge of conditions and entering into contracts for construction, means that it is unrealistic to think that this site will start to deliver housing within two to three years.
- 6c.7 It should be noted that the North of South Woodham Ferrers allocation is being promoted by Countryside, also promoter and developer of North East Chelmsford and promoter of land at Runwell, which is not proposed to be allocated in the PSP. Development by the same housebuilder on a number of sites in Chelmsford will further limit the ability to bring forward new homes and the choice in the local housing market.
- 6c.8 Development at this location will not achieve sustainable development and, given the constraints identified, the absence of evidence regarding the ability to deliver the level of development identified, and uncertainties regarding delivery of required

sustainable transport improvements, the plan is not positively prepared, or justified and is unsound.

- Qu.54 Strategic Growth Site 9 allocates 100 new homes at Danbury. Reference is also made to 'around 100 new homes' which term should it be? Is it appropriate to call this a 'site' or 'allocation' when no site or sites are identified within the Plan? At what stage is the Danbury Neighbourhood Plan and does the Plan provide a mechanism to ensure delivery of housing at Danbury should there be a delay in its production?
- 6c.9 No comment

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