
EXAMINATION STATEMENT – MATTER 8

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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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 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 8 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 8 – INFRASTRUCTURE

Main Issue: Whether the Plan sets out a positively prepared strategy for infrastructure provision to meet the Plan's development strategy and whether this is justified, effective and consistent with National policy. Are the policies relating to infrastructure sound?

Question 76. Infrastructure

The Plan sets out in Strategic Policy S11 the approach to be taken for the provision of necessary infrastructure and lists some specific infrastructure requirements in relation to transport and highways, flood risk management, community facilities, green and natural infrastructure and utilities.

- a. Are these requirements based on robust evidence, are they all necessary to support development during the Plan period and are they viable and deliverable within the timescales of relevant site developments?*
- b. The policy states that infrastructure is not limited to those listed. Does this mean that other infrastructure is necessary and has this been clearly identified and set out in other policies?*
- c. The supporting text in paragraph 6.57 lists transport and highways infrastructure schemes that are 'safeguarded from development or are allocated on the Policies Map'. Are these allocations and safeguarded land clearly set out as such in specific policies?*

- 2.1 We do not comment on each of the infrastructure items set out in **Strategic Policy S11 – Infrastructure Requirements** which provides the requirement for all developments to be supported by the necessary infrastructure, services and facilities to serve the needs arising from the development.
- 2.2 In response to 'part a' of the question, the policy allocation at Site 3b secures a stand-alone early years and child nursery and land to be safeguarded for the future expansion of the Sandon Park and Ride.
- 2.3 As set out in our response to Matter 6a Question 62, Redrow supports the provision of a standalone early years and childcare nursery at Site 3b and can confirm that it is viable and deliverable within the timescale of the site's development. It is proposed that the nursery would be privately built (potentially as part of the commercial development) and run by a private operator and, as such, we have highlighted that on this basis we consider that it is not necessary for Redrow to provide the cost of the facility to the Education Authority.
- 2.4 With regard to the land to be safeguarded for the future expansion of the Chelmer Valley Park and Ride and Sandon Park and Ride, there is no specific need at this time to deliver the expanded provision and so a cost has not been assigned to this. It has the potential to be funded through developer contributions collected via CIL.

- 2.5 With regard to “part c” of the question, the policy allocation at Site 3b secures land to be safeguarded for the future expansion of the Sandon Park and Ride – we support this objective. The Local Plan does not seek to specifically define this area, nor does it have to. The exact detail of the safeguarded area can be confirmed at the planning application stage, when the precise nature and land requirements of the proposed commercial development/early years nursery are known. Moreover, the safeguarded area for the Park & Ride will also have to be the subject of further discussions with the County Highway Authority at the planning application stage.

Question 78. Infrastructure

Does Strategic Policy S12 clearly set out how infrastructure will be secured and mitigation provided during the Plan period and is this justified, effective and compliant with national policy? Has the viability of providing necessary infrastructure been adequately assessed?

- 2.6 **Strategic Policy 12 – Securing Infrastructure** sets out the Council’s expectations regarding the delivery/coordination of infrastructure associated with new development.
- 2.7 The policy wording and the supporting text, both refer to the role of the Community Infrastructure Levy (CIL) and the Infrastructure Delivery Plan (IDP). We support the recognition given to these two important factors in the consideration of securing appropriate developer contributions and/or infrastructure. In doing so, we are mindful that the Council will at all times need to have regard to the CIL Regulations, not least CIL Reg 122, which requires any such planning obligations to be:
- Necessary to make the development acceptable in planning terms;
 - Directly related to the development; and
 - Fairly and reasonably related in scale and kind to the development.