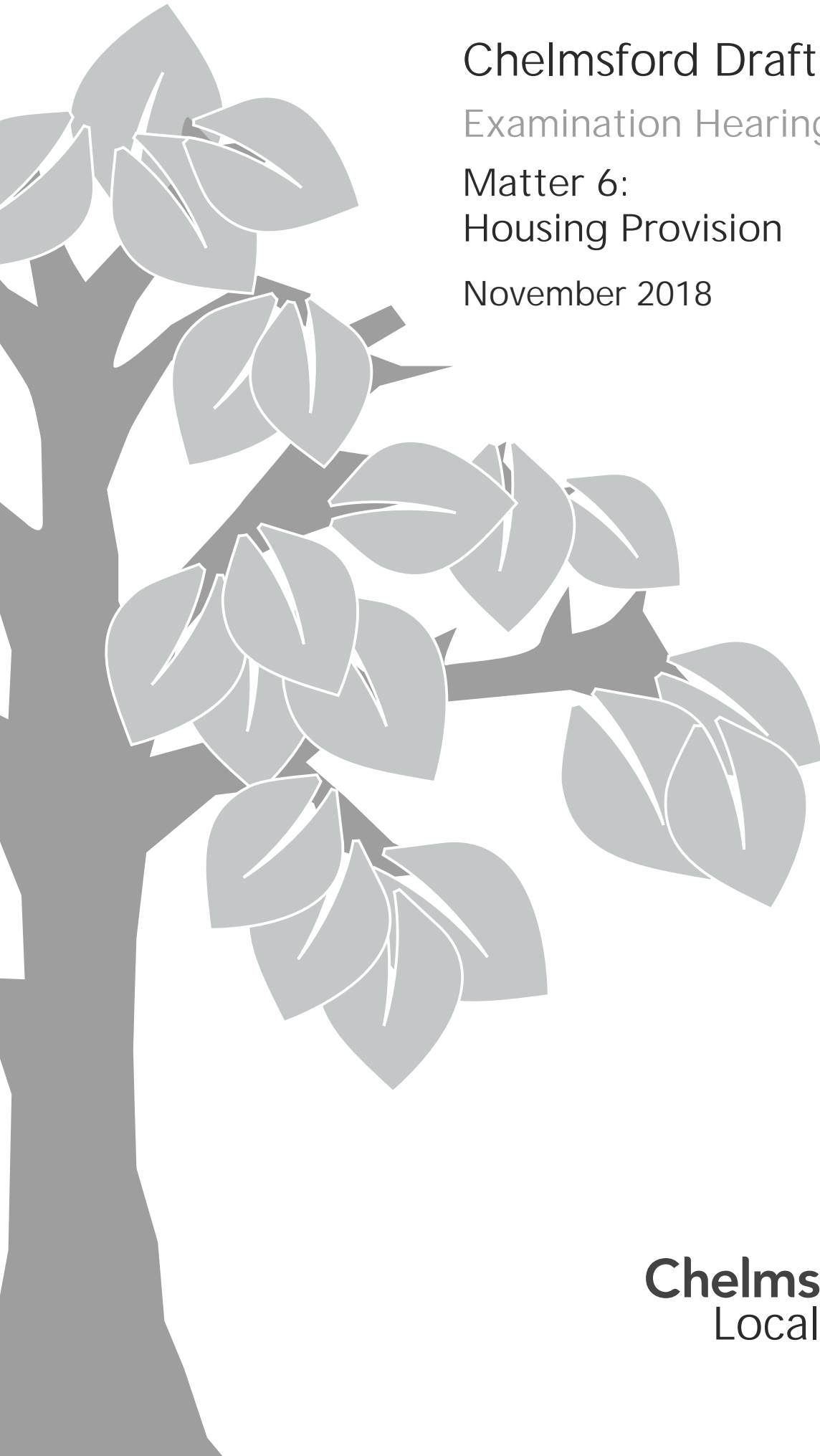


Chelmsford Draft Local Plan
Examination Hearing Statement
Matter 6:
Housing Provision
November 2018



Introduction

1. This hearing statement sets out the Council's response in relation to the Inspector's Matters, Issues and Questions.
2. All the evidence base documents referred to in this statement are listed at **Appendix A**, with their evidence base or examination document reference numbers as applicable.

Matter 6 – Housing provision

Question 54	Strategic Policy S8 identifies the housing requirement for the Plan period as a minimum of 18,515 net new homes (average of 805 dpa). Will it ensure that the Plan meets the full objectively assessed housing needs identified in the SHMA? Will it significantly boost housing supply in accordance with the Framework?
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Response to Q54

3. It is the Council's position that the Local Plan will meet the full objectively assessed housing needs and significantly boost housing supply.
4. In order to meet the requirements of national policy, the Council established the number and type of new homes needed within the Housing Market Area (HMA). This is identified in Braintree District Council, Chelmsford City Council, Colchester Borough Council, Tendring District Council Objectively Assessed Housing Need (OAHN) Study November 2016 update (**EB 048**). This states that the full OAN is 805 dpa for Chelmsford over the Plan period 2013-37, which equates to a total housing requirement of 18,515 new homes for the Plan period.
5. Braintree District Council, Chelmsford City Council, Colchester Borough Council, Tendring District Council Strategic Housing Market Assessment (SHMA) Update December 2015 (**EB 047**) calculates the level of affordable housing need and the size and tenure of all dwellings required in the overall OAHN Study.
6. The SHMA Update (**EB047 – paragraph 7.11**) calculates an annual requirement for 179 affordable homes in Chelmsford which it then tests against the Objectively Assessed Housing Need (OAHN). The SHMA Update (**EB047**) reports a figure of 23.1% based on an OAHN of 775 dwellings per annum identified in the OAHN Study published in July 2015 (**EB046**). This percentage is very slightly altered (22.2%) when calculated against an OAHN of 805 dwellings per annum identified in the OAHN Study November 2016 update (**EB048**).

7. Policy HO1 Size and Type of Housing ensures that an appropriate range of housing types and sizes are provided as part of new residential developments to meet the differing needs of the community. The latest SHMA indicates that the greatest need for market homes is two and three bedroom units. Section 8, Table 4 page 188 of the Local Plan will inform negotiations between the Council and developers to determine the appropriate mix of market housing.
8. The SHMA indicates that there is a net need for all sizes of affordable housing. Together with a requirement to provide 23.1% of the overall housing need as either social or affordable rented accommodation. Policy HO2(A) Affordable Housing and Rural Exception Sites requires provision of 35% of the total number of residential units to be provided and maintained as affordable housing. The 35% requirement for all criteria in Policy HO2(A) is based on the findings of the SHMA (**EB047**); Government policy; the findings of the Local Plan Viability Study including CIL Viability Review January 2018 (**EB082A**); completions monitoring data and the Council's priorities as set out in full in the Council's response to question 66a in Matter 6d.
9. The Government published a new standardised approach to calculating housing need in September 2018. The standard method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic undersupply. The standard method uses the same demographic starting point, as the Council's OAHN, national household growth projections (the most recent projections calculated over a 10 year consecutive period, with the current year being the first year). The standard method then applies one market signal adjustment related to a local affordability ratio. This is based on median house prices compared to median workplace earnings. The level of adjustment is capped to ensure that the resulting housing numbers are deliverable. Where the standard method identifies a minimum local housing need figure that is significantly higher than the number of homes currently being planned for, the cap is applied to help ensure that the minimum local housing need figure calculated using the standard method is as deliverable as possible.
10. If the draft Local Plan is adopted with a housing requirement of 805 net new homes per year the capped figure will be 1,127, based on the following calculation:
 - Step 1 Average annual household growth over 10 years - 556 (using the 2016-based household projections for the period 2018 – 2028)
 - Step 2 Adjusted annual local housing need figure – 812 $((11.38-4)/4 \times 0.25 = 0.46$ plus $1 = 1.46 \times 556 = 812$)
 - Step 3 Capped figure $(805 + (40\% \times 805) = 805 + 322 = 1127)$ 1127
11. As the capped figure is greater than the local housing need figure, the minimum figure for Chelmsford using the standard method will be 812 net new homes per annum. The local housing need figure is within 7 dwellings to the OAHN of 805 dwellings per annum.

12. Applying the local housing need figure of 812 from 2018 – 2036 equates to 14,616 new homes. The Local Plan provides for 21,872 new homes (17,774 for the period 2018 – 2036) which exceeds this requirement by 22%.
13. In light of the Government’s most recent published approach to the calculation of a standard methodology to calculating housing need, it is suggested that amendments are made to paragraphs 6.7 and 6.8 of the Local Plan in line with the wording outlined at the end of this question. This does not go to the soundness of the Local Plan, but reflects the latest position in respect of potential future housing numbers.
14. Strategic Policy S8 therefore provides for a total of 21,872 new homes (see proposed change AC27 in Schedule of Additional Changes **(SD002)**). This represents a 20% supply buffer above the total objectively assessed housing need figure of 18,515, and the Government’s standard methodology figure. This will ensure flexibility in delivery and help significantly boost housing supply over the Plan period. This is in line with paragraph 47 of the National Planning Policy Framework (NPPF) (2012). The buffer allows for an additional housing supply in Chelmsford to be maintained throughout the Local Plan period.
15. Boosting supply of housing should also be seen in context of the provision on sites allocated in the Local Plan which have the potential for further expansion beyond the Plan period of 2036 subject to further evidence base work such as Site 4 North East Chelmsford. Furthermore, it should also be noted that the site allocations policies identify housing numbers as ‘around’ rather than a maximum. This provides flexibility for more housing development where appropriate.
16. The Council will also continue to monitor and review the implementation of the Local Plan under Strategic Policy S15 Monitoring and Review to ensure that the Local Plan maintains a sufficient supply of housing sites.
17. The Local Plan is therefore effective at delivering housing to meet the OAHN.

Proposed changes:

Replace paragraph 6.7 with:

Although it does not apply to this Local Plan, the Government published a new standardised approach to calculating housing need in September 2018. The standard method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic undersupply. The standard method uses the same demographic starting point, as the Council’s OAHN, national household growth projections (the most recent projections calculated over a 10 year consecutive period, with the current year being the first year). The standard method then applies one market signal

adjustment related to a local affordability ratio. This is based on median house prices compared to median workplace earnings. The level of adjustment is capped to ensure that the resulting housing numbers are deliverable. Where the standard method identifies a minimum local housing need figure that is significantly higher than the number of homes currently being planned for, the cap is applied to help ensure that the minimum local housing need figure calculated using the standard method is as deliverable as possible. In October 2018 the Government launched a technical consultation on changes to the Planning Practice Guidance on the standard method for assessing local housing need. Elements of the technical discussion demonstrate that there is concern that the latest projections provide too little household growth for the 2016 based population projections.

Remove AC29 from the Schedule of Additional Changes **(SD002)** and amend paragraph 6.8 to: In Chelmsford's case, applying the proposed national methodology indicates an ~~annual~~ capped annual housing need for the period 2016-2036 of ~~980~~ **812** new homes per year. ~~It is not currently known what the housing need would be between 2026-2036. However, if the 980 new homes was extended~~ **Extending the 812 new homes per year** across the whole of the Plan period to 2036 would provide a total housing need of ~~19,600~~ **14,616** new homes. Taking into account housing completions ~~from up to 2016/17~~ **17/18**, the proposed housing supply set out in the Local Plan for 2016-2036 makes provision for ~~19,805~~ **19,784** new homes and therefore can accommodate the housing number currently generated by the standard methodology. As set out in the development trajectory at Appendix C, there are deliverable sites that will ensure that an average of ~~980~~ **812** homes per year can be maintained in the first five year period and beyond.

Q55	<p>Is the methodology for housing site assessment and selection as set out in the Strategic Land Availability Assessment (SLAA) documents EB072A to EB072G sound?</p> <ul style="list-style-type: none"> a. Do the ‘absolute constraints’ and criteria for suitability, deliverability and achievability accord with national planning policy and guidance and are they justified (EB072B and EB072C)? b. Are the SLAA site assessments robustly evidenced? c. Are the reasons for selecting sites and rejecting others clear? d. How has the SA informed the site selection decisions?
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Response to Q55a - Do the ‘absolute constraints’ and criteria for suitability, deliverability and achievability accord with national planning policy and guidance and are they justified (EB072B and EB072C)?

18. The Council’s Strategic Land Availability Assessment (SLAA) methodology is justified and effective, consistent with national policy.
19. Paragraph 159 of the NPPF (March 2012) states that local planning authorities should have a clear understanding of housing needs in their area and should prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and likely economic viability of land to meet the identified need for housing over the plan period. Planning Practice Guidance (PPG) offers practical guidance to support the NPPF.
20. The Council’s SLAA Database Methodology and Output Note **(EB072B)** and Assessment Criteria Note **(EB072C)** outline in full the procedure for assessing sites submitted through the SLAA process. The Council undertook an initial Call for Sites and Broad Locations between 3 November 2014 and 19 December 2014. Further opportunities for submitting land to the SLAA were available alongside each consultation on the Local Plan. Site submissions could be made for all proposed land uses, including housing and economic development sites. Each site submitted was then assessed to establish its suitability, availability and achievability for development, consistent with national policy.

21. It should be noted that the results of the SLAA do not mean that a site will necessarily be allocated for future development in the Local Plan. The SLAA is simply a way of helping the Council establish a long list of what sites/land could potentially be made available for development in the future. It is the Local Plan itself which will select sites and formerly allocate appropriate sites for development, not the SLAA. It is also important to note that the SLAA is not a one-off assessment and it will continue to be updated and monitored by the Council.

22. Following the submission the Local Plan for examination, the Council has since published the 2018 Strategic Land Availability Assessment (SLAA). In light of this the SLAA has been updated to reflect amendments to previously submitted sites and include new SLAA submissions received in 2018. As a result, the following evidence base documents now comprise the latest 2018 SLAA:

- The SLAA Viability Study (**EB072A**). This remains unchanged from the 2017 publication.
- The SLAA Methodology and Output Note (**EB172B**)
- The SLAA Assessment Criteria Note (**EB172C**)
- The Policy-on SLAA Assessment (**EB172D**)
- The List of Discounted Sites (**EB172E**)
- The Policy-off SLAA Assessment for Discounted Sites (**EB172F**)
- The SLAA Maps by Parished and Unparished Areas (**EB172G**)

23. The starting point for the SLAA is to identify sites that have critical issues which prevent the site being considered any further. These are terms ‘absolute constraints’ and are set out in **EB0172C**. In summary, where the following absolute constraints apply, the part of the site falling within that constraint is ruled out of the SLAA.

Metropolitan Green Belt

24. Section 9 of the NPPF (2012) outlines the importance that the government places on preventing inappropriate development in the Green Belt. Paragraphs 87 to 90 of the NPPF (2012) set out that certain forms of development are inappropriate development in the Green Belt and should not be approved except in very special circumstances. With the exception of certain types of building, the construction of new buildings in the Green Belt should be regarded as inappropriate development. In principle, housing in the Green Belt is not one of those exceptional acceptable forms of development. It is therefore considered justified for the Green Belt to be considered an absolute constraint.

Flood Zone 3b

25. Section 10 of the NPPF (2012) covers climate change, flooding and coastal change. Of particular relevance, paragraph 100 sets out that development should be directed away from areas at highest risk of flooding. Flood Zone 3b is the functional floodplain and is therefore considered unsuitable for development.

Green Wedge or Green Corridor

26. In line with Chelmsford's adopted Development Plan Documents, and the submitted Local Plan, the Council strictly limits development within the Green Wedge to protect and enhance the open character, protect natural habitats, nurture biodiversity and provide areas of informal recreation. The new Local Plan introduces 'Green Corridors' as further local areas for protection. The protection of these locally designated landscapes is in accordance with paragraph 109 of the NPPF (2012) which seeks to protect and enhance valued landscapes.
27. The 2018 SLAA has therefore assessed sites against the latest Submission Local Plan mapping and includes land within a Green Wedge or Green Corridor as an 'absolute constraint' as such land is generally unsuitable for development.

Special Area of Conservation, RAMSAR or Special Protection Area

28. Special Areas of Conservation are strictly protected sites designated under the European Commission Habitats Directive; Ramsar sites are wetlands of international importance designated under the Ramsar Convention; and Special Protection Areas are strictly protected sites classified in accordance with Article 4 of the European Commission Birds Directive. It is therefore considered justified to treat each of these designations as absolute constraints.

Site of Special Scientific Interest (SSSI)

29. SSSIs are considered absolute constraints as they are formal conservation designations assigned by Natural England and protected by law. It is therefore considered justified to treat each of these designations as absolute constraints.

Registered Park or Garden of Special Historic Interest

30. A register is held by Historic England to celebrate designed landscapes of note and encourage appropriate protection. Paragraph 126 of the NPPF 2012 sets out that Local Plans should set out a positive strategy for the conservation and enjoyment of the historic environment and conserve them in a manner which is appropriate. As such, it is considered justified to remove any site within such designation from the SLAA.

Scheduled Monument

31. These are a selection of nationally important archaeological sites that are designated by Historic England and closely managed. In accordance with paragraph 126 of the NPPF (2012) it is considered justified to class this designation as an absolute constraint.

Safeguarded corridor for strategic Trunk roads

32. Paragraph 41 of the NPPF (March 2012) states that sites and routes that could be critical for infrastructure development should be protected. As such, the Council seek to protect strategically important transport routes. Safeguarded routes are reflected within the Local Plan Pre-Submission Maps and are protected to ensure growing demand for additional road infrastructure use can be met. They are therefore justifiably considered an absolute constraint.

Sites highly unlikely to be available during the SLAA period

33. In line with paragraph 020 of the Housing and Economic Land Availability Assessment PPG, SLAA sites with an indicated ownership or legal problem are deemed to be unavailable within the plan period. As such, it is considered justified to remove these sites from the SLAA.

Sites highly unlikely to be achievable during the SLAA period

34. Paragraph 021 of the Housing and Economic Land Availability Assessment PPG advises that the achievability of a site is essentially a judgement about its economic viability. The Council's SLAA Viability Study (**EB072A**) determine the viability of 18 'typical' typologies. Each SLAA site is assigned an appropriate typology, and the achievability score for the site is then determined by the results within **EB072A**. As such, sites within typologies that are deemed to be unviable are considered unachievable and likely undeliverable within the plan period.

Allocated Mineral sites or Mineral sites with extant Planning Permission

35. Paragraph 144 of the NPPF (March 2012) states that Local Authorities should not permit "development proposals in mineral safeguarding areas where they may constrain potential future use for these purposes". As such, allocated mineral sites or those with planning permission for mineral extraction are identified as an absolute constraint as a starting point. If the site in question produces a Minerals Resource Assessment which sets out that the site has either been extracted or can be rephased to the satisfaction of Essex County Council (ECC), the Minerals Authority, then this not recorded as a constraint for that site.

Allocated Waste sites or Waste sites with extant Planning Permission

36. Article 13 of the European Union Waste Framework Directive outlines the importance of necessary measures to ensure waste management does not endanger human health or harm the environment. Thus, excluding sites that lie within operational waste site designations are considered to be justifiably excluded from the SLAA.

37. Following on from the absolute criteria, **EB172C** details how suitability, availability and achievability criteria will be scored. The Council consider that each sub-criterion featured is justifiably included in accordance with national policy and guidance.

Suitability Criteria

38. The Council's SLAA Assessment Criteria Note 2018 (**EB172C**) sets out the suitability criteria each site has been assessed against and the scores which are achievable against each criterion. In summary, the criteria considered are as follows:

- Policy restrictions or limitations:
 - Suitability of location for development
 - Impact on areas of defined open space
 - Impact on locally protected natural features
- Physical problems or limitations:
 - Access
 - Impact on Air Quality Management Areas
 - Bad neighbour constraints
 - Ground condition constraints
 - Impact on flood risk areas
 - Minerals constraints

39. Paragraph 019 of the Housing and Economic Land Availability Assessment PPG sets out that assessing the suitability of sites for development should be guided by the development plan, emerging local plan, and national policy; as well as market and industry requirements in the housing market area. In addition to this, the PPG identifies further factors that should be considered when assessing the suitability of a site:

- *“Physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;*
- *Potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation;*
- *Appropriateness and likely market attractiveness for the type of development proposed;*
- *Contribution to regeneration priority areas;*

- *Environmental/Amenity impacts experienced by would be occupiers and neighbouring areas.”*

40. In addition, paragraph 144 of the NPPF (March 2012), sets out that development within a Minerals Safeguarded Area should not be permitted. This criterion in **EB172C** is therefore justified.

41. In accordance with paragraph 109 of the NPPF (March 2012), to control the level of air and noise pollution across the city, the Council introduced an Air Quality Management Area (AQMA). This designation is therefore seen to be a justified consideration within the suitability assessment of the SLAA.

42. The full consideration of each of the above criteria cover the guidance set out in the PPG and NPPF. In addition, the overall output of the SLAA allows the City Council to extrapolate the sites which are brownfield or greenfield sites. The suitability criteria included within the Council’s SLAA is therefore appropriate and justified as they accord with national guidance.

Availability (Deliverability) Criteria

43. Paragraph 020 of the Housing and Economic Land Availability Assessment PPG indicates that when assessing availability, consideration needs to be given to any legal constraints and type of ownership of the site.

44. The Council’s SLAA Assessment Criteria Note (**EB172C**) sets out the availability criteria each site has been assessed against. It is outside the scope of a strategic assessment of this nature to collect and assess detailed information on legal and ownership issues. Therefore, sites have been considered and scored on the following high-level information relating to each site:

- Held by developer/willing owner/public sector (e.g. call for sites submissions, and sites where it is known that pre-application discussions are underway)
- Vacant land and buildings
- Low intensity land uses (e.g. agriculture, informal car parking)
- Established single use (e.g. business, sports club, school)
- Established multiple uses (e.g. industrial estate, retail parade)
- Thought to be in particularly complex/multiple ownership, or apparently subject to ransom strip.

45. Within the scope of a SLAA the assessment criteria set out above are considered to meet the requirements of national guidance. As such, the Council consider the availability (deliverability) criteria detailed in **EB172C** to be appropriately and justifiably included within the SLAA assessment as it accords with national guidance.

Achievability Criteria

46. Paragraph 021 of the Housing and Economic Land Availability Assessment PPG indicates that when assessing achievability, consideration needs to be given to viability and timescale of deliverability on the site.
47. Based on the SLAA Viability Study (**EB072A**) sites have been assessed against a relevant typology to assess its viability in its locality. This takes account of land values, locality, market conditions, physical constraints and as a result scores each site as either good, moderate or poor.
48. Based on viability assessment and other factors assessed each site is also assessed as to whether there is any reason it could not potentially be included within the five-year supply of houses.
49. In light of the above the Council consider the achievability criteria detailed in **EB172C**, in combination with the typology viability outcomes detailed in **EB072A**, to be appropriate and justified as it accords with national guidance.

Overall score

50. From the above assessments each site achieves three separate overall scores of 1, 2 or 3 for each of the criteria (suitability, availability, achievability). From these each site is then categorised overall as either a category 1, 2 or 3 site. Full details of these scores are set out in section 5 of **EB072C**. In summary:
- Category 1 sites must attain high overall scores against each of the suitability and availability criteria, and a moderate to high overall score against achievability. This accords with a site being considered as deliverable in accordance with footnote 11 of the NPPF (2012).
 - Category 2 sites must attain high overall scores against the suitability and reasonable scores against the availability and achievability criteria. This accords with a site being considered as developable in accordance with footnote 12 of the NPPF (2012).
 - Category 3 sites attain low scores against any or all of the suitability, availability and achievability criteria. These are sites which are considered as not currently developable.
51. In light of the above, the absolute constraints identified in the SLAA, and the criteria used to assess the suitability, deliverability and achievability of all sites is considered to be consistent with national policy and guidance. Furthermore, the process used to assess sites is clearly and transparently set out in the SLAA (**EB072A and EB172B to EB172G**).

Response to Q55b - Are the SLAA site assessments robustly evidenced?

52. The Council's SLAA Database Methodology (**EB172B**) and Assessment Criteria Note (**EB172C**) outline the procedure for assessing sites submitted through the SLAA process. The Council consider this high level algorithmic approach is robust as all sites are fairly assessed and all assessment outcomes accurately reflect the available information.
53. This involves an assessment of the Suitability, Availability and Achievability of each site which is open and transparent, as evidences in documents **EB072A** and **EB172B** to **EB172G**. The information used to assess sites comes from the forms and further information submitted by the Developer/Landowner who submitted the site into the SLAA, which has then been checked against City Council records and emerging planning policy. On receipt of a SLAA submission, the Council will use the OS map, provided within the submission, as the site area to assess. These are plotted and labelled clearly on the published SLAA Maps by Parished and Unparished Areas (**EB172G**).
54. Information gathered from the SLAA submission questionnaires and the Council's mapping are then inputted into a database which calculates the suitability, availability and achievability scores, based on the scoring set out in the SLAA Assessment Criteria Note (**EB172C**).
55. Based on these scores, the database then allocates each site to one of three categories; Category 1 – Deliverable Sites; Category 2 – Developable Sites; or Category 3 – Not Currently Developable. The database also calculates and indicative potential site yield, based on the site size, an assigned typology and constraints within the site. All these calculations and the typologies used to assess the sites can be found in the SLAA Viability Study and Assessment Criteria Note (**EB072A** and **EB172C**). A summary of each part of the assessment process is set out below:

Suitability Criteria

56. Determined by assessing site areas against the new Local Plan policies and physical constraints of each site, as shown on the Pre-Submission Local Plan Policies Map (**SD001**) and as amended by the Pre-Submission Local Plan Schedule of Additional Changes (**SD002**). These are largely desk based assessments using Local Plan mapping, with site visit being carried out if any verification is required. Areas of land which are constrained in any way are discounted from the overall site area of the piece of land submitted. After all possible constraints have been assessed, and areas of land discounted where necessary, the area of land of a site which is constraint free is the resulting area for consideration within the overall SLAA assessment.

Availability Criteria

57. Determined by information provided within the SLAA questionnaire in relation to ownership, legal constraints and relocation of existing uses. This assessment identifies issues which have an impact on when and if a site may become available for development. For example, issues which have been considered that may affect the availability of a site include, but are not limited to; multiple land ownerships, potential ransom strips and other land uses on a site.

Achievability Criteria

58. Determined by information provided within the SLAA questionnaire in relation to viability and timescales for deliverability. The SLAA Viability Study (**EB072A**) sets out the methodology used to test the potential viability of sites based on a number of potential site typologies.

Overall outputs

59. The overall assessment outputs of the SLAA are contained within **EB172D** – Policy on SLAA assessment. This contains an output sheet with details of the sites address and the suitability, availability and achievability scores for each site. A general comment is included on each assessment output sheets to indicate how the site has performed against the suitability, availability and achievability criteria, followed by a breakdown of the scores given for each individual criterion.
60. For further transparency, each assessment output sheet features a reference that directly relates to the Council's SLAA Maps by Parished and Unparished Areas (**EB172G**). These site assessment sheets are transparent in the scores attributed to each site and the reasons for those scores, which relate back to the Methodology and Output Note (**EB172B**), and Assessment Criteria Note (**EB172C**).
61. The Council also produces a policy-off assessment (**EB172F**) for all sites which were otherwise discounted due to the fact they either fell wholly within the Green Belt, a Green Wedge or a Green Corridor. This assesses these sites as if they were not in the Green Belt, a Green Wedge or a Green Corridor to inform the Council. However, at this point in time, based on Green Belt, Green Wedge and Green Corridor policy constraints these sites are ruled out as their location in these designations is an absolute constraint.

62. The Council therefore considers that the SLAA process is clearly set out in the Council's published Methodology and Output Note (**EB172B**), and Assessment Criteria Note (**EB172C**). The output from the site assessments is also clearly set out in a transparent manner in the resultant output sheets at **EB172D** and **EB172F**. Collectively these result in a clear, concise and transparent assessment which is supported by robust evidence.

**Response to Q55 c and d - Are the reasons for selecting sites and rejecting others clear?
How has the SA informed the site selection decisions?**

63. It is the Council's position that the reasons for selecting sites and rejecting others is clear and that site selection decisions have been fully informed by the Sustainability Appraisal (SA).

64. It should be noted that the SLAA process has not led directly to the selection of allocated sites in the Local Plan. The SLAA produced a 'pool' of sites assessed to be suitable, available and achievable, from which sites to be allocated in the Local Plan to meet housing and employment needs across the plan area could be selected, consistent with PPG ID 3-003-20140306.

65. Sites submitted within the SLAA are assessed against a set of suitability, availability and achievability criteria. The site then receives a total score for each of these criteria groups which will determine the sites overall categorisation. Sites will either be determined to be Category 1 – Deliverable Sites; Category 2 – Developable Sites; or Category 3 – Not Currently Developable. Category 1 sites are therefore preferable for development, whilst Category 3 sites are less desirable for development unless evidence is brought forward to demonstrate that constraints can be mitigated. A full explanation of the SLAA assessment process is set out in the Council's response to Q55b above.

66. The Local Plan site selection process itself was carried out as a follow-on process to the SLAA, involving working with the wider Local Plan evidence base, the Sustainability Appraisal and an analysis of the main issues raised following consultations on the Issues and Options and Preferred Options Local Plans.

67. To deliver the Spatial Strategy, the Local Plan directs growth to locations within three Growth Areas. The site allocations identified in each Growth Area include Strategic Growth Sites, Growth Sites, Opportunity Sites and Existing Commitments. In addition, six Special Policy Areas relating to particular existing establishments in the countryside are identified within the Local Plan.

68. The reasons for the selection of the proposed site allocations and for the rejection of alternatives is set out within the Local Plan SA Reports:

- Preferred Options Consultation Document Sustainability Appraisal Report (2017) (**EB 006**);
- Pre-Submission Local Plan Sustainability Appraisal Report (2018) (**SD 004**);
- Pre-Submission Local Plan: Additional Changes Sustainability Appraisal Report: Addendum (2018) (**SD 005**).

69. These are discussed further below. See also responses to Q5b and Q5c in the Council's Hearings Statement for Matter 1 (**EX012**).

70. The Issues and Options Consultation Document (**EB 115**) did not include proposed site allocations for new housing or employment development, alternative or rejected sites. Instead it contained potential 'Areas of Search' for new development growth within the three Spatial Options proposed. As such, the Issues and Options SA Report did not appraise site specific housing and employment allocations, or alternatives.

71. The Issues and Options Consultation Document (**EB 115**) proposed to continue the existing designation of Special Policy Areas at Chelmsford City Racecourse, Sandford Mill, Hanningfield Treatment Works, Broomfield Hospital, RHS Hyde Hall Gardens and Writtle College. These are existing large and established institutional uses within the countryside and are identified as Special Policy Areas in order to support their necessary functional and operational requirements over the Plan period. These are described in Section 7 of the Issues and Options Consultation Document (**EB 115**) and appraised first in the Site Allocations Proposed Submission DPD Sustainability Appraisal Report (2010) (**EX 024**) and then in the Preferred Options Consultation Document Sustainability Appraisal Report (2017) (**EB 006**).

72. Following consideration of the comments received on the Issues and Options Consultation Document (**EB 115**), ongoing engagement and further evidence base work, the Council selected its preferred options for the Local Plan in terms of the amount and location of growth to be delivered in the City Area up to 2036 and which formed the Preferred Options Consultation Document (2017) (**EB 116**). The Preferred Options Consultation Document SA Report (2017) (**EB 006**) appraised the three growth areas and proposed and alternative site allocations. A total of 99 housing sites, 4 employment sites and 1 Gypsy and Traveller site were considered:

- 32 sites were proposed for Growth Area 1 (with 9 alternative sites and 3 alternative clusters of sites considered);
- 6 sites proposed for Growth Area 2 (with 26 alternative sites and 7 alternative clusters of sites considered); and
- 1 alternative site located across Growth Area 1 and 2
- 3 proposed sites for Growth Area 3 (with 17 alternatives sites considered).

73. The Preferred Options Consultation included the six Special Policy Areas as no additional Special Policy Areas were identified by the Council following the Issues and Options consultation. Proposed changes to the six existing Special Policy Areas were appraised in the Preferred Options Consultation Document SA Report (2017) (**EB 006**).

74. The reasons for the selection of site allocations and rejection of alternatives is given in the Preferred Options Consultation SA Report (2017) (**EB 006**) at Appendix G (pages G31 – G40).

75. Taking into account representations received during consultation on the Preferred Options Consultation Document (2017) (**EB 116**), new evidence and the recommendations of assessments, the Council prepared the Pre-Submission Local Plan (2018) (**SD 001**). The Pre-Submission Local Plan SA Report (2018) (**SD 004**) assessed the growth areas and proposed and alternative site allocations. A total of 125 housing sites, 6 employment sites and 1 Gypsy and Traveller site were considered:

- 35 sites were proposed for Growth Area 1 (with 20 alternative sites and 3 alternative clusters of sites considered);
- 8 sites proposed for Growth Area 2 (with 34 alternative sites and 12 alternative clusters of sites considered, including 1 cluster that contains 2 reasonable alternative sites that have also been appraised individually);
- 1 alternative site located across Growth Area 1 and 2; and
- 3 proposed sites for Growth Area 3 (with 18 alternatives sites considered).

76. The Pre-Submission Consultation included the six Special Policy Areas as no additional Special Policy Areas were identified by the Council following the Preferred Options consultation. Proposed changes to the six existing Special Policy Areas were appraised in the Pre-Submission Local Plan SA Report (2018) (**SD 004**).

77. The reasons for the selection of site allocations and rejection of alternatives is given in the Pre-Submission Local Plan SA Report (2018) (**SD 004**) at Appendix G (pages G35 – G46).

78. Taking into account representations received during consultation on the Pre-Submission Local Plan (2018) (**SD 001**), updated evidence and the recommendations of the SA assessment, the Council has identified a number of proposed 'Additional Changes' to the Pre-Submission Local Plan. The Pre-Submission Local Plan: Additional Changes SA Report: Addendum (2018) (**SD 005**) appraises the additional changes to the proposed and alternative site allocations. The following were considered:

- A total of changes to seven proposed housing site allocations and the associated growth site policies.
- A total of 14 additional reasonable alternative sites (comprising 13 housing-led sites and one employment site) alongside a further two 'clusters' comprising multiple sites.

79. The 'Additional Changes' to the Pre-Submission Local Plan retained the six Special Policy Areas as no additional Special Policy Areas were identified by the Council following the Pre-Submission consultation. Proposed changes to the six existing Special Policy Areas were appraised in the Pre-Submission Local Plan: Additional Changes SA Report: Addendum (2018) **(SD 005)**.
80. The reasons for the proposed changes to the site allocations is given in the table at Appendix B of the Pre-Submission Local Plan: Additional Changes SA Report: Addendum (2018) **(SD 005)**. The rationale for rejecting the alternative sites is described in Table 3.5 and Table 3.6 of the same report.
81. All reasonable alternatives to sites considered by the Council in developing the Local Plan to-date have been subject to appraisal using the same criteria as part of the preparation of the Pre-Submission Local Plan SA Report (2018) **(SD 004)** and the Addendum **(SD 005)**. This includes sites initially assessed as part of the SA of the Preferred Options Consultation Document (which have been reviewed in order to take into account relevant additional baseline information provided by promoters and consultation responses where appropriate) and new sites submitted in response to the consultation as well as sites previously discounted in Green Wedges and Green Corridors.
82. The findings of the appraisal of both the proposed site allocations and all reasonable alternatives (including clusters) are presented in Appendix G (as updated by **EX 010**) of the Pre-Submission Local Plan SA Report (2018) **(SD 004)** and Appendix F of the Addendum **(SD 005)**. These appraisals do not take into account any proposed mitigation by a site developer, nor the provisions of the associated site allocation policies contained in Chapter 7 of the Pre-Submission Local Plan nor the mitigation provided by the other proposed Local Plan policies. This is to ensure that the SA methodology has been applied consistently and all sites have been treated equally. It would be inappropriate to accept mitigation proposed by a developer as site submissions received by the Council during the preparation of the Local Plan are accompanied by proposals of differing level of detail and commitment. In addition, there are no certainties that proposals made in regard to mitigation at the site allocation stage will become fact, prior to consideration through the planning application process. However, where factual (baseline) information has been provided by developers, this has informed the site SA. The detailed appraisal of the effect of these policies is contained in Appendix I of the Pre-Submission Local Plan SA Report (2018) **(SD 004)** and Appendix E of the Addendum **(SD 005)**.

83. The Topic Paper 1 Spatial Strategy and Strategic Sites (June 2018) **(TP 001)** summaries the steps, processes and evidence that have guided and informed the formulation the selection of sites and rejection of others. Some sites promoted through the Council’s SLAA and have not been allocated or assessed as reasonable alternatives for example because they fall within the Green Belt or have been dismissed on appeal. These sites are listed in Appendix 1 of the Topic Paper together with a commentary of why they have been discounted.
84. At each stage, preparing the SA Report was an iterative process, in parallel with preparing the Local Plan to be consulted upon. At all appropriate stages, proposed site allocations and reasonable alternatives (as defined in Appendix G of the SA **(EB004)** and further covered in Topic Paper 1 **(TP 001)** and Topic Paper 4 **(TP 004)**) and were assessed to help inform the most suitable sites contained within the Local Plan.
85. Collectively the above demonstrates that the reasons for selecting sites and rejecting others is clear and that site selection decisions have been informed by the SLAA and SA processes.

Question 56	<p>The Plan in Strategic Policy S8 identifies a total land supply for 21,893 new dwellings during the Plan period. It includes completions since 2013, commitments, site allocations and a windfall allowance.</p> <ul style="list-style-type: none"> a. Does the level of supply provide sufficient head room to enable the Council to react quickly to any unforeseen change in circumstances and to ensure that the full requirement is met during the Plan period? b. Does the Council’s assessment of windfall allowances (EB067) provide compelling evidence that such sites will continue to provide a reliable source of housing land supply during the Plan period? Are the allowance levels justified and are they consistent with national policy and guidance?
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Response to Q56

- a. Does the level of supply provide sufficient head room to enable the Council to react quickly to any unforeseen change in circumstances and to ensure that the full requirement is met during the Plan period?**

86. As set out in Strategic Policy S8 the housing requirement to 2036 is 18,515 net new homes, at a rate of 805 per annum. The supply of homes to 2036, as summarised in Strategic Policy S8, and as updated by the Schedule of additional changes **(SD002)**, is 21,872 net new homes. This exceeds the housing requirement by 3,357 net new homes, which allows for headroom of approximately 20% above the housing requirement.

87. Furthermore, the Council has a robust five-year supply of homes. As set out in the Five-year Housing Land Supply Position Statement April 2018 **(EB065)**, of the 6,396 homes which make up the five year housing land supply 77% of these already have planning permission. This in itself builds in a short-term headroom allowance for the next five years. Furthermore, in years 6 onwards there are 2,497 new homes which already have planning permission.

88. Given the level of homes which already have planning permission and the overall supply buffer of close to 20% is considered to be robust. In addition, national changes proposed to calculate housing need and housing delivery, the supply within the Local Plan is sufficient to accommodate these future changes. This point is covered fully in the Council's response to Matter 3 Q14. The Local Plan also includes a range of site types, sizes and localities. This offers some further ability to assist in delivery should the market or other circumstances change.

89. The Local Plan will be monitored in accordance with the Monitoring Framework set out in Section 10 of the Local Plan. In terms of the housing supply and completions, this will be done on an annual basis through the Council's Authority Monitoring Report (AMR). Monitoring annually allows the Council to react quickly and effectively in respect of any change in circumstances which may require addressing.

90. However, should further changes to national policy occur, or economic circumstances change in the future, the 20% headroom allows the Council sufficient time to consider its options and make any necessary adjustments needed.

91. In summary, the additional 20% of supply and continued monitoring of the Local Plan provides sufficient head room to enable the Council to react quickly to any unforeseen change in circumstances and to ensure that the full housing requirement is met during the Local Plan period.

b. Does the Council's assessment of windfall allowances (EB067) provide compelling evidence that such sites will continue to provide a reliable source of housing land supply during the Plan period? Are the allowance levels justified and are they consistent with national policy and guidance?

92. The methodology for the Council's assessment of windfall allowances to be included within the Local Plan is set out in full within the Council's Housing Windfall Assessment April 2018 **(EB067)**. This sets out compelling evidence to support the inclusion of windfalls within the Local Plan which is consistent with national policy and guidance.

93. In accordance with paragraph 48 of the NPPF (2012), **EB067** has regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and does not include residential gardens. Using this information, the Council has projected windfall allowance for the inclusion in the five-year housing supply. This is reviewed and reassessed on an annual basis for inclusion within the five-year housing supply. The numbers projected for inclusion in the supply going forward have consistently been shown to be achieved within the Chelmsford area and there is no reason to doubt they will not continue to be available. It should be noted that this assessment has consistently been found to be credible, robust and compliant with national policy and guidance at Section 78 appeals. The following appeal extracts make particular reference to the Council's assessment of a windfall allowance:

94. Land South East of The Lion Inn, Main Road, Boreham (Ref: APP/W1525/W/15/3001771).
Decision Date: 8 March 2016:

'The Council has made an allowance for 181 dwellings from windfall sites. This is based on the figures for the past three years (about 140 dwellings per year) with the Hayes Leisure Park units, where the status of park homes was regularised, omitted from the calculations as being outliers. This seems a fair assessment. It is unrealistic to consider that no further windfalls will come forward, especially in years 4 and 5. There are existing windfall sites in the Council's Housing Site Schedule and these, together with an allowance for the last two years, brings the total to 181 units per year. As this is based upon recent figures, albeit over a relatively short period, the figures are reasonable.'

95. Land adjacent to Baileys Cottage, Chatham Green (Ref: APP/W1525/W/15/3137020).
Decision Date: 23 March 2016:

'The Council have applied a windfall allowance amounting to 3% in the period 2018-2020. Based on the Council's evidence on historic windfall delivery, I consider this to be a reasonable assumption.'

96. The PPG advises that Local Planning Authorities have the ability to identify broad locations in year 6-15, which could include a windfall allowance based on a geographical area (using the same criteria as set out in paragraph 48 of the NPPF). As such, the Local Plan also includes a windfall allowance of 100 dwellings per annum for year 6 onwards. The justification and methodology for calculating this allowance is set out in full within the Council's Housing Windfall Assessment April 2018 (**EB067**).

97. In summary, while there is compelling evidence to support 220 dwellings per annum for years 1 to 5 in the Council's Housing Trajectory, as the data for historic windfall completions does not go back beyond 6 years it is considered unreasonable to project at that level beyond year 5. However, on the basis that the draft new Local Plan is not proposing any major shift in planning policy there is no reason to doubt that windfalls will continue to come forward at a consistent rate. Given the unpredictability of supply and completion rates over a longer period the Council have used the reduced rate of 100 dwellings per annum beyond year 5 until 2035/36 of the Housing Trajectory. This is considered to be a very conservative and prudent figure given that previous windfall completions have continuously exceeded this figure.

98. In light of the above, the inclusion of 220 windfalls completions within the five-year supply and 100 for year 6 onwards are supported by compelling evidence and are justified and consistent with the national policy and guidance. The inclusion of these windfall projections within the figure of 21,893 in Strategic Policy S8 is therefore robust.

<p>Question 57</p>	<p>Appendix C of the Plan sets out the development trajectories which indicate that deliverability of sites for housing is based on developers' projected build out rates and information from site promoters for years 2017/18 to 2021/22.</p> <ul style="list-style-type: none"> a. Are these rates achievable? b. How has deliverability of sites beyond 2021/22 been assessed and are they realistic? c. Does the trajectory reflect the time needed for allocated sites, particularly the large strategic growth sites, to produce a masterplan (where required), gain planning permission, agree any necessary planning obligations and provide for any facilities? <i>(Also see below for specific questions for site allocations within the Growth Areas)</i>
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Response to Q57

a. Are these rates achievable?

99. The detailed delivery rates for all sites and allocations are contained within the development trajectories in Appendix C of the Pre-Submission Local Plan (**SD001**), as updated in the Pre-Submission Local Plan Schedule of Additional Changes (**SD002**). The rates have been based on a robust methodology used by the Council and there is no reason to doubt their achievability.

100. Delivery rates for the five-year supply of housing (2018/19 to 2022/23) are set out on an annual basis, with numbers divided into market and affordable housing. These figures have been derived by carrying out regular site visits to existing development sites, information received from the Council's Housing Enabling Officers, Development Management Planning Officers, weekly reports from Building Control, CIL commencement monthly reports, and annual confirmation of delivery rates with developers. The full methodology for calculating the delivery rates for the first five years is set out in section 5 of the Council's Five-Year Housing Land Supply Methodology April 2018 (**EB066**). Using all these sources of information results in delivery rates which are justified, achievable and consistent with national policy.
101. These delivery rates have been based on sites which are considered deliverable, are available for development now, are suitable for housing, and are viable and achievable as supported by the Local Plan Viability Study Including CIL Viability Review and its accompanying update (**EB082A** and **EB082B**).
102. The Council closely monitors and publishes quarterly completions for the current large strategic development at Beaulieu and Channels in the north east of Chelmsford. This shows that these sites are achieving the annual projections set out in the Council's Housing Site Schedule. These are attached at **Appendix B** of this Hearing Statement.
103. Furthermore, as set out in the Council's Five-Year Housing Land Supply Site Schedule April 2018 (**EB063**) 77% of homes (4,935) within the first 5 years have planning permission.
104. This methodology for projecting the supply for the first 5 years has been consistently found to be robust and justified at Section 78 Appeals. For these reasons it is considered that the requirements of footnote 11 of paragraph 47 of the NPPF (2012), and paragraph 48 of the NPPF (2012) have been met and the delivery rates are achievable.

b. How has deliverability of sites beyond 2021/22 been assessed and are they realistic?

105. The deliverability of sites for years 6 onwards has been assessed in accordance with paragraph 47 of the NPPF (2012). The rates are realistic and achievable for that time period.
106. Paragraph 47 requires local planning authorities to identify a supply of specific, developable sites or broad locations for growth, for years 6-10, and where possible, for years 11-15.

107. Delivery rates for housing development in years 6 are contained within the development trajectories in Appendix C of the Pre-Submission Local Plan **(SD001)**, as updated in the Pre-Submission Local Plan Schedule of Additional Changes **(SD002)** are now from year 2022/23 onwards. These delivery rates have been based on sites which are considered developable in accordance with footnote 12 of paragraph 47 of the NPPF (2012).
108. The projected timeframes for delivery of sites proposed for delivery in years 6 and beyond are based firstly on historic delivery rates for similar sites, as well as discussions with specific site developers, but also with providers of other services such as schools and utility service providers. These have informed any limitations on sites, for example the need and timing for schools and waste water infrastructure has been considered at some sites and as such the Council have had to limit the level of development which can come forward, despite the developers stating their build out rates would be earlier. The resultant timeframes set out have been agreed and are supported as being achievable by developers in the Statements of Common Ground with site promoters.
109. All future site allocations have also been tested through the Council's Local Plan Viability Study Including CIL Viability Review January 2018 **(EB082A)** and the Chelmsford City Council – Post IDP Viability Update June 2018 **(EB082B)**. These assessments have been based on these projected delivery rates set out within the Local Plan. All sites have been found to be viable when considered against these delivery rates.
110. In light of the methodology set out above the requirements of footnote 12 of paragraph 47 of the NPPF (2012) have been met and the delivery rates shown for years 6 onwards are realistic and achievable for that time period.
- c. Does the trajectory reflect the time needed for allocated sites, particularly the large strategic growth sites, to produce a masterplan (where required), gain planning permission, agree any necessary planning obligations and provide for any facilities? (Also see below for specific questions for site allocations within the Growth Areas)**
111. Sites coming forward early on within the first 5 years on the Local Plan Trajectory have largely already progressed to one of the following stages:
- Initial engagement on the Masterplanning process
 - Signed PPA for the Masterplanning process
 - Stage 0 to 1 of the Masterplanning process
 - Planning Permission approved
 - Approved Planning Brief in place

112. Full details of the approved Masterplanning process are set out in the Council's Masterplan Procedure for Local Plan Development Allocations to 2036 (**EB140B**). Further details on the progress of specific sites is covered under Matter 6a, 6b and 6c). Planning Performance Agreements (PPA's) for the Masterplanning process have been signed with sites 2, 4 and 5 and significant progress has been made towards PAA's with sites 3, 6 and 7. It is envisaged that these will be signed in due course, but crucially before the submission of a planning application.
113. The Council has been in on-going detailed discussions with the site developers since the early preparation of the Local Plan. This has assisted in producing Statements of Common Ground with sites which includes agreement on the level and type of infrastructure required for each site.
114. Furthermore, the Chelmsford Infrastructure Delivery Plan January 2018 (**EB018A**) and its June 2018 Update (**EB018B**) (IDP) has informed the requirement for all forms of infrastructure necessary to support site allocations. The trajectory has been informed by the needs and requirements of the IDP. Where relevant the timings of necessary infrastructure provision have been factored into the trajectory, and in some areas has restricted the delivery rates in the trajectory from which may have otherwise been achievable. Further details relating to the timings of any infrastructure items on specific sites is covered under Matter 6a, 6b and 6c.
115. Early and full engagement with site developers and infrastructure providers will assist in progressing sites in a timely manner.
116. The substantive development of the larger and more complex sites, for example Strategic Growth Site 4 - North East Chelmsford, are not scheduled to come forward till the later stages of the Local Plan. This allows for time for the more complex negotiations and infrastructure items to be agreed and put in place where necessary. Further details relating to the timings on specific sites and how this has been derived is covered under Matters 6a, 6b and 6c.
117. The timeframes set out in the trajectory have been informed by developers and historic delivery rates for similar sites, and through the requirements of the IDP (**EB018A** and **EB018B**) on a site by site basis. As a result, the trajectory reflects the time necessary for allocated sites to produce a masterplan, gain planning permission, agree any necessary planning obligations and provide for any facilities.

Question 58	It is not clear whether some of the site allocations within the Plan are ‘policies’ as they are not referred to as such, except Policy GR1. Should all the site allocations clearly state that they are policies for clarity and effectiveness?
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Response to Q58

118. Section 7 of the Local Plan Pre-Submission Document (**SD001**) sets out a range of site policies to enable the delivery of the spatial strategy. The policies set out the key requirements for the site, the amount and type of development expected to be provided within each of the site allocations. Paragraphs 7.2 to 7.7 of the Local Plan references these as ‘site policies’.
119. For clarity and effectiveness, the Council proposes a change to the policy titles to include ‘policy’ in each, for example Strategic Growth Site Policy XX – name
120. The table below sets out the proposed additional changes:

Policy	Local Plan Page	Proposed Additional Change
Strategic Growth Site 1a – Chelmer Waterside	88	Strategic Growth Site Policy 1a – Chelmer Waterside
Strategic Growth Site 1b – Essex Policy Headquarters and Sport Ground, New Court Road	92	No change required as AC60 applies i.e. the site is proposed for deletion
Strategic Growth Site 1c – North of Gloucester Avenue (John Shennan)	94	Strategic Growth Site Policy 1c – North of Gloucester Avenue (John Shennan)
Strategic Growth Site 1d – Former St. Peter’s College, Fox Crescent	97	Strategic Growth Site Policy 1d – Former St. Peter’s College, Fox Crescent
Strategic Growth Site 1e – Former Royal Mail Premises, Victoria Road	99	Strategic Growth Site Policy 1e – Former Royal Mail Premises, Victoria Road
Strategic Growth Site 1f – Riverside Ice and Leisure Land, Victoria Road	101	Strategic Growth Site Policy 1f – Riverside Ice and Leisure Land, Victoria Road
Strategic Growth Site 1g – Civic Centre Land, Fairfield Road	104	Strategic Growth Site Policy 1g – Civic Centre Land, Fairfield Road
Strategic Growth Site 1h – Eastwood House Car Park, Glebe Road	106	Strategic Growth Site Policy 1h – Eastwood House Car Park, Glebe Road
Growth Site 1i – Chelmsford Social Club and Private Car Park, 55 Springfield Road	111	Growth Site Policy 1i – Chelmsford Social Club and Private Car Park, 55 Springfield Road
Growth Site 1j – Ashby House Car	112	Growth Site Policy 1j – Ashby House Car

Policy	Local Plan Page	Proposed Additional Change
Park, New Street		Park, New Street
Growth Site 1k – Rectory Lane Car Park West	112	Growth Site Policy 1k – Rectory Lane Car Park West
Growth Site 1l – Car Park to the West of County Hotel, Rainsford Road	113	Growth Site Policy 1l – Car Park to the West of County Hotel, Rainsford Road
Growth Site 1m – Former Chelmsford Electrical and Car Wash, Brook Street	113	Growth Site Policy 1m – Former Chelmsford Electrical and Car Wash, Brook Street
Growth Site 1n – BT Telephone Exchange, Cottage Place	114	Growth Site Policy 1n – BT Telephone Exchange, Cottage Place
Growth Site 1o – Rectory Lane Car Park East	114	Growth Site Policy 1o – Rectory Lane Car Park East
Growth Site 1p – Waterhouse Lane Depot and Nursery	115	Growth Site Policy 1p – Waterhouse Lane Depot and Nursery
Growth Site 1q – Church Hall Site, Woodhall Road	115	Growth Site Policy 1q – Church Hall Site, Woodhall Road
Growth Site 1r – British Legion, New London Road	115	Growth Site Policy 1r – British Legion, New London Road
Growth Site 1s – Rear of 17 to 37 Beach's Drive	116	Growth Site Policy 1s – Rear of 17 to 37 Beach's Drive
Growth Site 1t – Garage Site, St Nazaire Road	116	Growth Site Policy 1t – Garage Site, St Nazaire Road
Growth Site 1u – Garage Site and Land, Medway Close	116	Growth Site Policy 1u – Garage Site and Land, Medway Close
Growth Site 1v – Car Park R/O Bellamy Court, Broomfield Road	117	Growth Site Policy 1v – Car Park R/O Bellamy Court, Broomfield Road
Opportunity Site OS1a – Rivermead, Bishop Hall Lane	117	Opportunity Site Policy OS1a – Rivermead, Bishop Hall Lane
Opportunity Site OS1b – Railway Sidings, Brook Street	118	Opportunity Site Policy OS1b – Railway Sidings, Brook Street
Strategic Growth Site 2 – West Chelmsford	119	Strategic Growth Site Policy 2 – West Chelmsford
Strategic Growth Site 3a – East Chelmsford (Manor Farm)	122	Strategic Growth Site Policy 3a – East Chelmsford (Manor Farm)
Strategic Growth Site 3b – East Chelmsford – Land North of Maldon Road (Employment)	127	Strategic Growth Site Policy 3b – East Chelmsford – Land North of Maldon Road (Employment)
Strategic Growth Site 3c – East Chelmsford – Land South Maldon Road	129	Strategic Growth Site Policy 3c – East Chelmsford – Land South Maldon Road
Growth Site 3d – East Chelmsford – Land North of Maldon Road (Residential)	133	Growth Site Policy 3d – East Chelmsford – Land North of Maldon Road (Residential)

Policy	Local Plan Page	Proposed Additional Change
Existing Commitment EC1 – Land North of Galleywood Reservoir	136	Existing Commitment Policy EC1 – Land North of Galleywood Reservoir
Existing Commitment EC2 – Land Surrounding Telephone Exchange, Ongar Road, Writtle	138	Existing Commitment Policy EC2 – Land Surrounding Telephone Exchange, Ongar Road, Writtle
Strategic Growth Site 4 – North East Chelmsford	142	Strategic Growth Site Policy 4 – North East Chelmsford
Strategic Growth Site 5a – Great Leighs – Lane at Moulsham Hall	150	Strategic Growth Site Policy 5a – Great Leighs – Lane at Moulsham Hall
Strategic Growth Site 5b – Great Leighs - Land East of London Road	154	Strategic Growth Site Policy 5b – Great Leighs - Land East of London Road
Strategic Growth Site 5c – Great Leighs - Land North and South of Banters Lane	157	Strategic Growth Site Policy 5c – Great Leighs - Land North and South of Banters Lane
Strategic Growth Site 6 – North of Broomfield	160	Strategic Growth Site Policy 6 – North of Broomfield
Travellers Site GT1 – Drakes Lane Gypsy and Traveller Site	164	Travellers Site Policy GT1 – Drakes Lane Gypsy and Traveller Site
Existing Commitment EC3 – Great Leighs – Land East of Main Road	165	Existing Commitment Policy EC3 – Great Leighs – Land East of Main Road
Existing Commitment EC4 – East of Boreham	166	Existing Commitment Policy EC4 – East of Boreham
Strategic Growth Site 7 – North of South Woodham Ferrers	171	Strategic Growth Site Policy 7 – North of South Woodham Ferrers
Growth Site 8 – South of Bicknacre	176	Growth Site Policy 8 – South of Bicknacre
Strategic Growth Site 9 – Danbury	178	Strategic Growth Site Policy 9 – Danbury
Existing Commitment EC5 – St Giles, Moor Hall Lane, Bicknacre	180	Existing Commitment Policy EC5 – St Giles, Moor Hall Lane, Bicknacre

Question 59	<p>Existing residential development commitments (EC1, EC2, EC3, EC4 and EC5) are identified within the Plan as sites with and without planning permission. Whilst the latter are sites that are currently allocations within the Council's existing Local Development Framework (LDF) as they do not yet have planning permission is calling them 'commitments' or 're-allocations' appropriate?</p> <p>Will existing allocation policies from the LDF remain in place should this Plan be found sound or will they be superseded?</p> <p>If the former, why are the sites included within this Plan?</p> <p>If the latter, are the inclusion of these sites within this Plan based on robust evidence?</p> <p>Are there any particular reasons why the sites have not delivered housing under the LDF?</p>
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Response to Q59

Existing residential development commitments (EC1, EC2, EC3, EC4 and EC5) are identified within the Plan as sites with and without planning permission. Whilst the latter are sites that are currently allocations within the Council's existing Local Development Framework (LDF) as they do not yet have planning permission is calling them 'commitments' or 're-allocations' appropriate?

121. It is the Council's position that the sites included in the Local Plan as existing commitments are appropriate and based on robust evidence. The existing commitments 1-5 in the Pre-Submission Local Plan are either sites with planning permission or were previously allocated for housing in the Local Development Framework (LDF) and as such brought forward as existing Local Plan commitments (Page 85 Pre-Submission Local Plan **SD001**).
122. Sites EC1, EC2 and EC5 have been brought forward from the Council's adopted LDF as allocations for new housing development as they have not yet been implemented. These are expected to be delivered by 2036 and are therefore rolled forward in the new Local Plan.
123. There are also two sites included as existing commitments (EC3 and EC4) which are new allocations which have planning permission but have not yet been implemented.
124. The table below outlines the status of each site.

Site	SLAA Reference	Planning Permission	Why an existing commitment?
EC1 – Land North of Galleywood Reservoir -	CFS260	Permission granted 16/01012/OUT approved 13/12/2017	This is a re-allocation from LDF Site Allocations Document (SAD15). The site is outside of the urban area and the Council wish for it continue to be

Site	SLAA Reference	Planning Permission	Why an existing commitment?
			promoted as a site allocation as generally would not be acceptable without a specific allocation.
EC2 – Land Surrounding Telephone Exchange, Ongar Road, Writtle	No reference	No application	This is a re-allocation from LDF Site Allocations Document (SAD19). The site is outside of the urban area and the Council wish for it continue to be promoted as a site allocation as generally would not be acceptable without a specific allocation.
EC3 – Great Leighs – Land East of Main Road	CFS105	14/01791/OUT allowed on appeal 26/09/2016 and reserved matters application approved in March 2018.	This is a new allocation. Site (EC3) was previously refused by the Council but the site was allowed at appeal. It is included as an existing commitment allocation to enable a comprehensive development with the adjoining site (5c) and the other sites within the Great Leighs area.
EC4 – East of Boreham	CFS106/ CFS145	Site has outlined planning permission (14/01552/OUT) – allowed on appeal 26/05/2016 and expected to be delivered between 17/18 and 20/22	This is a new allocation. This site was re-designated as an Existing Commitment (EC4) in the Pre-Submission Document following consultation on the Preferred Options Stage of the Local Plan. The site gained outline planning permission in 2016 but has not yet been implemented. The existing commitment provides certainty to the site's development as it is located in a Key Service Settlement in line with the Spatial Strategy.
EC5 – St Giles, Moor Hall Lane, Bicknacre	15SLAA43	No application	This is a re-allocation from LDF Site Allocations Document (SAD22). The site is outside of the urban area and the Council wish for it continue to be promoted as a site allocation as generally would not be acceptable without a specific allocation.

125. Whilst EC2 and EC5 do not yet have planning permission, they are re-allocations from the LDF, and therefore ‘existing commitments’ which are continuing over into the new Local Plan. The Council consider that it is appropriate that these sites are ‘existing commitments’ because they are sites outside of the urban area which if brought forward would not generally be acceptable without a specific allocation designation.
126. These allocations provide some certainty and direction for the development of the sites. EC2 is also located within a Key Service Settlement and existing Defined Settlement Boundary. This is in keeping with the spatial strategy.
127. EC5 is allocated to provide Specialist Residential Accommodation (SRA) and includes an existing established residential home which provides accommodation for adults with learning difficulties and mental health conditions. The Strategic Housing Market Assessment (SHMA)(**EB047**) also demonstrates there is a need for specialist residential accommodation in the area.

Will existing allocation policies from the LDF remain in place should this Plan be found sound or will they be superseded?

128. No, the existing allocation policies within the LDF will be superseded on adoption of the new Local Plan.

If the former, why are the sites included within this Plan? If the latter, are the inclusion of these sites within this Plan based on robust evidence?

129. The inclusion of the existing commitments within the Local Plan are based on robust evidence. This includes:

Sustainability Appraisal

130. All the existing commitments have been appraised as part of the Sustainability Appraisal (**SD004**). Appendix G sets out the appraisal of Proposed Site Allocations and Alternatives.

Location	SA Rationale
EC1 - Land North of Galleywood Reservoir, Galleywood	Complies well with Strategic Priorities, Vision, Spatial Principles and Spatial Strategy in particular by focussing development at well-connected locations and in accordance with the Settlement Hierarchy and, providing opportunities to contribute towards and enhance existing services and facilities. Viable and available and supported by the Plan evidence base. No overriding physical constraints to bringing forward the allocation in this location.
EC2 - Land Surrounding Telephone Exchange, Ongar Road, Writtle	Complies well with Strategic Priorities, Vision, Spatial Principles and Spatial Strategy in particular by

	<p>focussing development at well-connected locations and in accordance with the Settlement Hierarchy, making the best use brownfield land and, providing opportunities to contribute towards and enhance existing services and facilities.</p> <p>Viable and available and supported by the Plan evidence base. No overriding physical constraints to bringing forward the allocation in this location.</p>
EC3 - Great Leighs – Land East of Main Road	<p>Complies well with Strategic Priorities, Vision, Spatial Principles and Spatial Strategy in particular by focussing development at well-connected locations and in accordance with the Settlement Hierarchy and providing opportunities to contribute towards and enhance existing services and facilities.</p> <p>Supported by the Plan evidence base e.g. Landscape Sensitivity Assessment, Heritage Assessment and Archaeological Assessment.</p> <p>The site has planning permission. Viable and available. No overriding physical constraints to bringing forward the allocation in this location.</p>
EC4 - East of Boreham	<p>Complies well with Strategic Priorities, Vision, Spatial Principles and Spatial Strategy in particular by focussing development at well-connected locations and in accordance with the Settlement Hierarchy and providing opportunities to contribute towards and enhance existing services and facilities.</p> <p>Supported by the Plan evidence base e.g. Landscape Sensitivity Assessment, Heritage Assessment and Archaeological Assessment.</p> <p>The site has planning permission. Viable and available. No overriding physical constraints to bringing forward the allocation in this location.</p>
EC5 - St Giles, Moor Hall Lane, Bicknacre	<p>Principles and Spatial Strategy in particular by focussing development in accordance with the Settlement Hierarchy and by providing homes for all.</p> <p>Supported by the Plan evidence base and viable and available. No overriding physical constraints to bringing forward the allocation in this location.</p>

Traffic modelling

131. Whilst the Preferred Options modelling did not include the existing commitments, the subsequent Pre-Submission modelling including the existing commitments 1-5. This was based on 245 with planning permission modelled in the Do-Minimum scenario, and a further 100 modelled in the Local Plan scenario. This is documented in the Chelmsford Local Plan Pre-Submission Strategic and Local Junction Modelling Report (summary page viii and page 11) **(EB029)**.

132. From a modelling perspective, the existing commitments in the Local Plan scenario are understood to be small in size and, individually, are expected to generate no more than around 15 trips (arrivals and departures) in either peak hour. It is therefore unlikely that they will have a noticeable impact on the road network either locally or across the wider administrative area of Chelmsford. Sites EC3 and EC4 (modelled in the Do-Minimum scenario) are larger and might be expected to have some impact on the local road network. Modelling of key junctions near to these developments in Great Leighs and Boreham, considers the future capacity impact and outlines mitigation options where required.

Landscape

133. A Landscape Sensitivity and Capacity Assessment (**EB100A**) was undertaken in March 2017 which provides an analysis of the sensitivity and capacity for development of land across the Chelmsford City Council area based on criteria that accords with current best practice guidance and methodology. This include EC3 and EC4.
134. EC3 has been assessed as part of the Landscape Sensitivity and Capacity Assessment Report (**EB100A**); the assessed parcel that falls within the allocated site is GLP4. This parcel is not judged to be of high landscape sensitivity or low landscape capacity. Key planning and land management guidelines identified, such as the provision of landscape buffers and enhancement of landscape elements, are reflected in the site policies to help ensure that the new development will respect its setting.
135. EC4 has been assessed as part of the Landscape Sensitivity and Capacity Assessment Report (**EB100A**); the assessed parcel that falls within the allocated site is BLP2. This parcel is not judged to be of high landscape sensitivity or low landscape capacity. Key planning and land management guidelines identified, such as the provision of landscape buffers and enhancement of landscape elements, are reflected in the site policies to help ensure that the new development will respect its setting.
136. **Appendix C** (Summary of the Landscape Sensitivity and Capacity Evidence for Existing Commitment Sites) to this Hearing Statement sets out the detailed site assessment for EC3 and EC4 as an extract from **EB100A**. Furthermore, this appendix also includes a desktop study for EC5. EC5 has been assessed as part of an appendix to Hearing Statement 6; the assessed parcel that falls within the allocated site is BKLP5. This parcel is not judged to be of high landscape sensitivity or low landscape capacity. Key planning and land management guidelines identified, such as the provision of landscape buffers and enhancement of landscape elements, are reflected in the site policies to help ensure that the new development will respect its setting.

137. A landscape sensitivity and capacity assessment was not undertaken for EC1 and EC2 as these sites are located within the existing defined settlement boundary and therefore it was not considered necessary to assess these sites.

Are there any particular reasons why the sites have not delivered housing under the LDF?

138. The adopted Local Development Framework (LDF) extends until 2021. EC1, EC2 and EC5 have not delivered housing under the adopted Plan to date. Collectively these sites provide 70 dwellings. Although they have not yet been delivered within the LDF they are all sites which, for the reasons set out below, are considered deliverable sites which should continue to form land allocation in the Local Plan.
139. It should be noted that only those sites from the LDF with a realistic prospect of coming forward have been carried over as 'Existing Commitments' within the Local Plan, rather than a blanket re-allocation to all former LDF sites which have not yet been delivered.
140. There is interest in bringing forward EC1. EC1 was subject to an outline planning application submitted in June 2016 with all matters reserved except for access. The land is jointly owned by Chelmsford City Council and Essex and Suffolk Water (who made the application). The site has been delayed coming forward due to acquiring technical reports, for example confirmation of drainage connections. This delay resulted in the preferred developer party withdrawing from the scheme and therefore the site is currently out to previous interested parties for current expressions of interest. A reserved matters application is expected following the outcome of this process.
141. There is also interest in bringing forward EC5. This site is owned by Genesis, who have had several pre-application enquiries with the Council. The Council confirm that the principle of the development is acceptable. However, the schemes proposed to date are above the level set out in the emerging Local Plan. As such there is concern for the scale, design and proportions of the buildings which need to better relate to the existing development on the site and the rural context. Additional information would also be required in relation to trees, ecology and flooding for the schemes.
142. There are no particular overriding reasons why these sites have not delivered under the LDF which would affect their re-allocation in the Local Plan.

Question 60	<p>In relation to the five year housing land supply (5YHLS):</p> <ol style="list-style-type: none"> Is the Council’s 5YHLS methodology (EB066) justified and consistent with national policy? Does the delivery of a surplus 73 dwellings against the Plan’s housing requirement since 2013 justify a 5% additional buffer? Is the identification of a 7.7 year housing land supply by the Council in EB065 justified and based on robust evidence of housing supply? Overall, will the housing provision have a reasonable prospect of delivering a 5YHLS at the point of adoption of the Plan?
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Response to Q60

a. Is the Council’s 5YHLS methodology (EB066) justified and consistent with national policy?

143. It is the Council’s position that its 5YHLS methodology (**EB066**) is fully justified and consistent with national policy. **EB066** sets out a transparent and evidence-based process to calculate the 5YHLS. The Council updated its 5YHLS methodology in April 2018, which was originally published in August 2015. This latest update was published to take into account the emerging national policy changes in relation to the Housing Delivery Test.

144. The 5YHLS methodology (**EB066**) sets out the following important principles:

- The formula and inputs for the 5YHLS calculation
- The identification of deliverable sites and their delivery rates

145. The starting point for the calculation of the 5YHLS is the housing requirement. As set out in the Council’s Matter 3 Hearing Statement (**EX014**), the objectively assessed housing needs have been assessed across the Housing Market Area (HMA). The Objectively Assessed Housing Needs Assessment (**EB048**) identifies Chelmsford’s objectively assessed housing need as 805dpa. The base date of the assessment is 2013.

146. The 5YHLS methodology (**EB066**) sets out a five-stage process for the calculation of the 5YHLS as set out below. This follows the 'Sedgefield' method i.e. any historic shortfalls are to be added to the five-year housing requirement.

- Stage 1 Multiply housing target by five (years)
- Stage 2 Add historic shortfall or deduct historic surplus
- Stage 3 Add 5% to the sum of Stages 1 and 2 = Five year housing requirement
- Stage 4 Divide five year housing requirement by five (years) = Annual requirement
- Stage 5 Divide annual requirement by deliverable housing supply = Years of supply

147. Paragraph 47, in particular footnote 11 of the NPPF (2012) and paragraph 3-031-20140306 of the accompanying PPG set out what should be considered a deliverable site in relation to the 5YHLS. Sites included in the 5YHLS should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site. Sites with planning permission should be considered deliverable until permission expires. Sites allocated in Local Plans can also be considered deliverable.

148. Using the criteria set out in the NPPF (2012) and the accompanying PPG, the 5YHLS methodology (**EB066**) sets out the means to determine the delivery rates of the identified deliverable sites. As set out in **EB066**, this includes, regular site visits by the Council's Development Monitoring Officer, information from Council Housing Enabling Development Management Officers and Building Control and CIL commencements. In addition to this, an annual confirmation of delivery rates is requested from developers.

149. The consistency of the Council's 5YHLS methodology (**EB066**) has been tested at numerous s78 planning appeals. The methodology has been found justified and consistent with national planning policy at these appeals (see the Council's Hearing Statement to Matter 3 **EX 014**).

b. Does the delivery of a surplus of 73 dwellings against the Plan's housing requirement since 2013 justify a 5% additional buffer?

150. Paragraph 47 of the NPPF (2012) states that an additional buffer of 5% (moved forward from later in the plan period) should be added to the 5YHLS to ensure choice and competition in the market for land. Where there is a record of persistent under delivery of housing this should be increased to 20%.

151. The Local Plan period starts in 2013 as this is the base date for the OAHN. Therefore, it is entirely reasonable and logical for the starting point for determining whether there has been a record of persistent under delivery of housing to start from this same date. To attempt to go further back in time outside the Local Plan period, when the housing requirement was based on the now revoked East of England Plan, which was not an OAHN, results in a conflation of methodologies resulting in a comparison of 'apples with pears'.

152. From 1 April 2013 to 31 March 2018, there have been 4,098 dwellings completed in Chelmsford as set out in the Housing Trajectory **(EB064)**. The total OAHN for this period was 4,025 dwellings (805x5 years). Therefore, cumulatively since 2013 there has been a small oversupply of 73 dwellings.

153. Paragraph 47 of the NPPF (2012) makes it clear that in all situations 5% should be added to the 5YHLS regardless of whether there is any historic oversupply. It is clear that there is no record of persistent under delivery of housing since 2013, in fact there is a small surplus. Therefore, the use of the 5% buffer in determining the 5YLS is entirely appropriate.

c. Is the identification of a 7.7 year housing land supply by the Council in EB065 justified and based on robust evidence of housing supply?

154. As set out at the response to Q60a, the Council has a robust 5YHLS methodology **(EB066)** which is justified and consistent with national policy. The Council can demonstrate a housing land supply of 7.7 years based on a housing requirement of 805dpa as set out in the Five Year Housing Land Position Statement **(EB065)**.

155. The Council's Housing Site Schedule **(EB063)** which is replicated in Annex 5 of the Schedule of Additional Changes **(SD002)** shows that 77% of the 5YHLS of 6,396 dwellings already has the benefit of planning permission.

5YHLS: 2018/19-2022/23	No. of dwellings within 5YHLS	% of total dwellings within 5YHLS
Sites with planning permission	4,935	77%
Existing commitments without planning permission	100	2%
New Local Plan allocations without planning permission	1,361	21%

Sites with Planning Permission

156. As set out in the footnote 11 of the NPPF, sites with extant planning permissions should be considered deliverable. The Council, in accordance with the 5YHLS methodology **(EB066)**, annually reviews and updates 5YHLS and requests site updates from developers. A Phasing Log **(EB068)** which sets out the contact with developers is recorded and published annually. Therefore, the sites within the 5YHLS that benefit from planning permission are all considered deliverable with a reasonable prospect of delivery in the next five years. The phasing and build-out rates is based on annually updated information sourced directly from developers of the sites.

Existing commitments without planning permission

157. This comprises one site for 100 dwellings – Site 303 (**EB063**) Lockside, Navigation Road a brownfield site in the City Centre. This site is within the ownership of the City Council and is allocated for development within the existing Chelmsford Town Centre AAP (**EB119**). The Council has resolved to dispose of the site and is preparing the site for market. Therefore, based upon the Council's disposal and development of the neighbouring site (Site 306 (**EB063**) Peninsular Site Chelmer Waterside) it is considered reasonable to expect completions on this site in the period 2021-23.

New Local Plan allocations without planning permission

158. It is considered that some of the new Local Plan allocations can yield dwelling completions in the first five years. These are either smaller sites, where there is less development lead-in time required or on sites where early phases are already under construction. The Council requires masterplans to be approved on new local plan allocations. A masterplan process has been agreed by the Council and Masterplan Planning Performance Agreements (PPAs) have been agreed with relevant developers/promoters. The table below sets out the sites in question and provides a commentary on their current status

Site no, (EB063)	Local Plan Site Allocation	No. Dwellings in 5YLS	Site Status
280	SGS 1d Former St Peter's College	131	<ul style="list-style-type: none"> - Site owned by ECC - CCC and ECC prepared and approved Development Brief in 2017 - Phase 2 Planning and Development Ltd appointed by ECC to prepare planning application
281	SGS 1e Former Royal Mail Premises	150	<ul style="list-style-type: none"> - Bellway Homes planning application submitted is currently under consideration
299	SGS 2 West Chelmsford	240	<ul style="list-style-type: none"> - Masterplan PPA agreed with developer Crest Nicholson - Masterplan formally submitted to City Council for consideration - 240 dwellings from total of 800 considered deliverable in 5YHLS - Timescales for delivery agreed in SOCG14
300	SGS 3a East Chelmsford (Manor Farm)	100	<ul style="list-style-type: none"> - Masterplan PPA being worked up with developer Hopkins Homes - 100 dwellings from total of 450 considered deliverable in 5YHLS - Timescales for delivery agreed in SOCG18B

301	SGS 3c East Chelmsford (Manor Farm)	100	<ul style="list-style-type: none"> - Masterplan PPA being worked up with developer with developer Redrow Homes - Timescales for delivery agreed in SOCG18C
302	SGS 3d East Chelmsford (Manor Farm)	50	<ul style="list-style-type: none"> - Masterplan PPA being worked up with developer Redrow Homes - Timescales for delivery agreed in SOCG18C
308	SGS 4 North East Chelmsford	100	<ul style="list-style-type: none"> - Adjacent Beaulieu and Channels developments currently under construction - 100 dwellings from total of 3,000 considered deliverable in 5YHLS - Masterplan PPA agreed with North East Chelmsford Garden Village Consortium - Timescales for delivery agreed in SOCG21
310	SGS 5b – Gt Leighs Land East of London Road	170	<ul style="list-style-type: none"> - Masterplan PPA agreed with promoter consortium - 100 dwellings from total of 250 considered deliverable in 5YHLS - Timescales for delivery agreed in SOCG16B
312	SGS 6 North of Broomfield	90	<ul style="list-style-type: none"> - Masterplan PPA being worked up with developer Bloor Homes - 90 dwellings from total of 450 considered deliverable in 5YHLS - Timescales for delivery agreed in SOCG19
316	SGS 7 Land North of South Woodham Ferrers	200	<ul style="list-style-type: none"> - Masterplan PPA being worked up with developer Countryside Properties, ECC and Landowners - 200 dwellings from total of 1,000 considered deliverable in 5YHLS - Timescales for delivery agreed in SOCG20A
317	GS 8 South of Bicknacre	30	<ul style="list-style-type: none"> - Planning application 16/02021/OUT submitted for 35 homes approved 20/08/2018
TOTAL		1,361	

d. Overall, will the housing provision have a reasonable prospect of delivering a 5YHLS at the point of adoption of the Plan?

159. As set out in the responses to Question 60 a, b, and c, the Council has a robust, justified and consistent methodology for determining its 5YHLS. Nearly 80% of the 5YHLS already has the benefit of planning permission, with only 20% of supply reliant on sites currently without planning permission. However, preparatory work on the sites without planning permission are well advanced and there are no delivery constraints which would hinder these sites coming forward in a timely manner. Therefore, in accordance with footnote 11 of the NPPF, all the sites have a realistic prospect of delivery in the first five years.
160. To demonstrate the robustness of the Council's approach, a five year housing land supply can be established solely on those sites with the benefit of planning permission e.g. 4,935 dwellings with planning permission divided by 830 (annual OAHN less surplus plus 5% buffer, as set out in **EB066**) equals 5.94 years of supply.
161. The five year land supply is based on the period 2018/19 to 2022/23. As there is a buffer of 2.7 years of supply, there is more than a reasonable prospect that at the point of adoption, envisaged in 2019, the Local Plan will be able to deliver a five year housing land supply.

Question 61	Is there sufficient flexibility in the housing trajectory to ensure that housing land supply within the Plan area will be maintained and will deliver the housing requirement of Strategic Policy S8?
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Response to Q61

162. The Council's response to Q37 (Matter 5 **EX 016**) and 57 above cover in full the approach taken by the Council in respect of projecting the delivery rates within the Local Plan.
163. The detailed delivery rates for all sites and allocations are contained within the development trajectories in Appendix C of the Pre-Submission Local Plan (**SD001**) and as updated in the Pre-Submission Local Plan Schedule of Additional Changes (**SD 002**). In accordance with paragraph 47 and footnotes 11 and 12 of the NPPF (2012), the Council have identified a supply of specific deliverable sites to provide five years' worth of housing and a supply of specific, developable sites for years six onwards.
164. This methodology for projecting the supply for the first five years has been consistently found to be robust and justified at Section 78 Appeals (See the Council's Hearing Statement to Matter 3 **EX014**), including a series of Public Inquires.

165. Collectively the methods set out in the Council’s response to Q37 Matter 5 **EX 016**, have resulted in the phasing set out in Strategic Policy S9, as updated by **SD002**. These timeframes set out within the trajectory are justified and consistent with the requirements of paragraphs 47 and 48 of the NPPF (2012).
166. The housing delivery rates set out in the trajectory support a robust projection of over 1,000 dwellings per annum. When set against the housing requirement of 805 dwellings per annum, and the fact the Council has a delivery surplus of 73 dwellings, this provides at least a 20% buffer per annum. Furthermore, the Council currently has in excess of a 5 year supply of housing, 77% of which has planning permission. The Council maintains a rolling land supply of housing which is comprehensively reviewed and published annually to ensure it retains a robust housing supply.
167. For these reasons the approach set out in the Housing Trajectory provides sufficient supply and flexibility to ensure the housing land supply will be maintained to deliver the Local Plan housing requirements set out in Strategic Policy S8.

APPENDIX A

EVIDENCE BASE LIST FOR MATTER 5	
SD001	Pre-Submission Document
SD002	Pre-Submission Local Plan Schedule of Additional Changes
SD004	Pre-Submission Sustainability Appraisal
SD005	Pre-Submission Local Plan: Additional Changes Sustainability Appraisal Report: Addendum
EB004	Issues and Options Consultation Document Sustainability Appraisal Report Non-Technical Summary
EB006	Preferred Options Consultation Document Sustainability Appraisal Report
EB018A	Chelmsford Infrastructure Delivery Plan January 2018
EB018B	Chelmsford Infrastructure Delivery Plan June 2018 Update
EB029	Pre-Submission Strategic and Local Junction Modelling Report
EB046	Braintree District Council, Chelmsford City Council, Colchester Borough Council, Tendring District Council Objectively Assessed Housing Need Study July 2015
EB047	Braintree District Council, Chelmsford City Council, Colchester Borough Council, Tendring District Council Strategic Housing Market Assessment Update December 2015
EB048	Braintree District Council, Chelmsford City Council, Colchester Borough Council, Tendring District Council Objectively Assessed Housing Need Study November 2016 update
EB063	Five Year Land Supply Site Schedule April 2018
EB064	Housing Trajectory April 2018
EB065	Five-year Housing Land Supply Position Statement April 2018

EB066	Five Year Housing Land Supply Methodology April 2018
EB067	Housing Windfall Assessment April 2018
EB068	Housing Site Schedule – Phasing Log
EB072A	SLAA Appendix 1: SLAA Viability Study
EB072B	SLAA Appendix 2: SLAA Methodology and Output Note
EB072C	SLAA Appendix 3: SLAA Assessment Criteria Note
EB082A	Local Plan Viability Study Including CIL Viability Review January 2018
EB082B	Chelmsford City Council – Post IDP Viability Update June 2018
EB119	Chelmsford Town Centre Area Action Plan including Proposals Map
EB100A	Landscape Sensitivity and Capacity Assessment Report
EB115	Issues and Options Consultation Document
EB116	Preferred Options Consultation Document
EB140B	Masterplan Procedure for Local Plan Development Allocations to 2036
EB172B	SLAA Appendix 2: SLAA Methodology and Output Note
EB172C	SLAA Appendix 3: SLAA Assessment Criteria Note
EB172D	SLAA Appendix 4: Policy-on SLAA Assessment
EB172E	SLAA Appendix 5: List of Discounted Sites
EB172F	SLAA Appendix 6: Policy-off SLAA Assessment for Discounted Sites
EB172G	SLAA Maps by Parished and Unparished Areas
EX010	Technical note: Chelmsford Local Plan: Detailed Site Sustainability Appraisal Information
EX012	Matter 1 – Statutory/Legal Compliance Hearing Statement, Chelmsford City Council
EX014	Matter 3 – Objectively Assessed Housing Need Hearing Statement, Chelmsford City Council
EX016	Matter 5 – Spatial Strategy Hearing Statement, Chelmsford City Council
EX 024	Site Allocations Proposed Submission DPD Sustainability Appraisal Report (2010)
SOCG14	Statement of Common Ground: West Chelmsford Site Promoter on Strategic Matters
SOCG16B	Statement of Common Ground: Great Leighs Holdings and Estates – Strategic Growth Sites 5a and 5b
SOCG18B	Statement of Common Ground: Hopkins Homes – Strategic Growth Site 3a
SOCG18C	Statement of Common Ground: Redrow Homes – Strategic Growth Sites 3b, 3c, 3d
SOCG19	Statement of Common Ground: North of Broomfield Site Promoters – Strategic Matters
SOCG20A	Statement of Common Ground: SWF Site Promoters – Strategic Matters
SOCG21	Statement of Common Ground: North East Chelmsford Site Promoters – Strategic Matters
TP001	Topic Paper 1 Spatial Strategy and Site Update
TP004	Topic Paper 4 Sustainability Appraisal/Strategic Environmental Assessment and Habitats Regulation Assessment

APPENDIX B

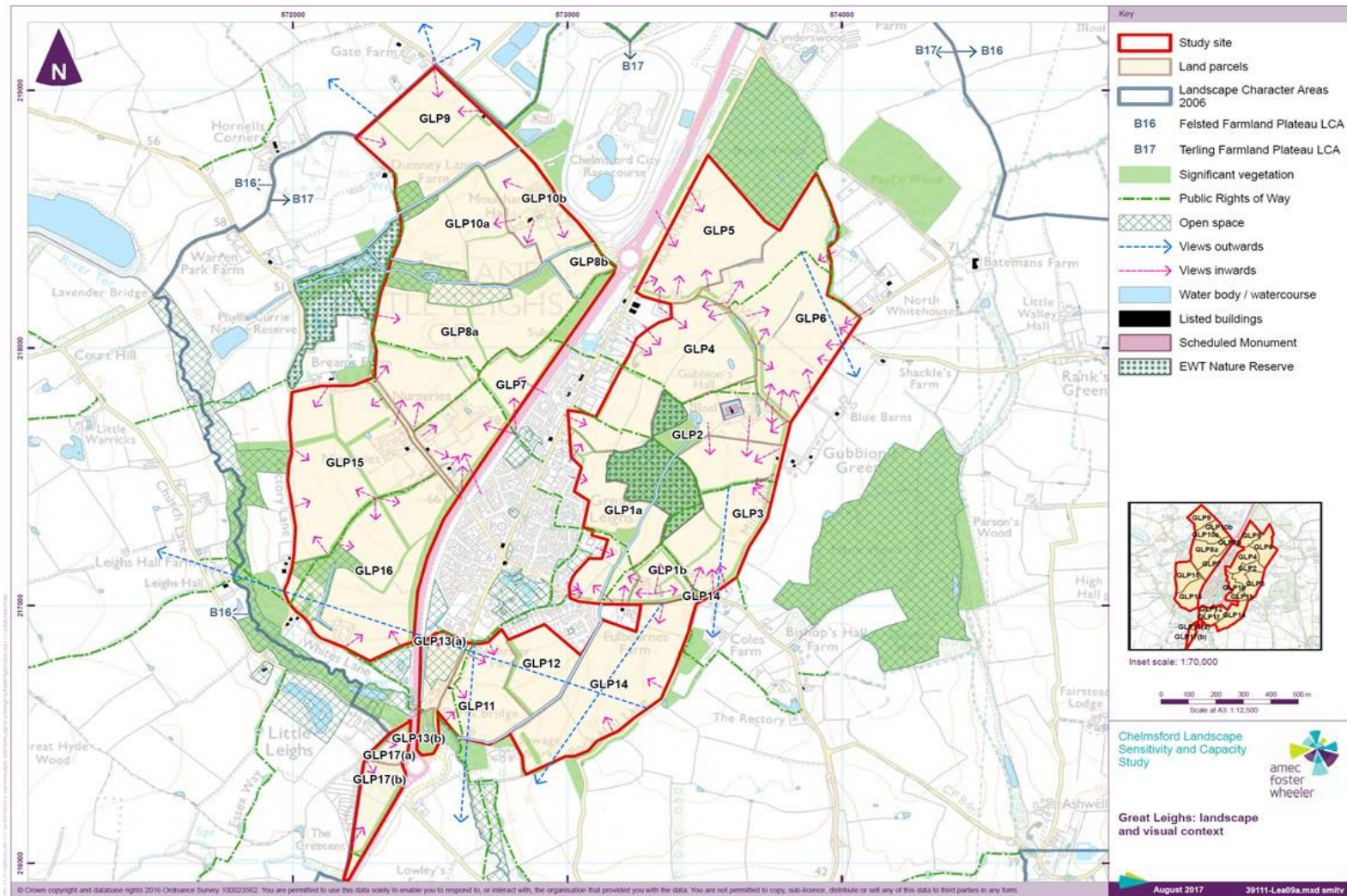
Beaulieu	Units in Phase	2015/16				2016/17				2017/18				2018/19				Total completions per phase (rolling)	Phase Complete
		Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4		
Zone D	49	6		34		9												49	Yes
Zone A	184					30	40	10	18	31	29	17	7	2				184	Yes
Zone B	74								3	29	16	11	15					74	Yes
Zone C1	199										18		41	22	6			87	
Neighbourhood Centre	34										15	19						34	Yes
Zone G	68												14	14	30			58	
Zone E	198																		
Zone F & I	254																		
Annual Totals for all Phases		40				110				262				74				486	
		2015/16				2016/17				2017/18				2018/19					
Channels	Units in Phase	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Total completions per phase (rolling)	Phase Complete
Phase 1	181				1	20	40	19	25	12	20	7		29				173	
Phase 2	95		6	6	18	27	15	14		9								95	Yes
Phase 3A&B	74								12	8	30	19	5					74	Yes
Phase 3c 3d and 5	240																		
Phase 4	27																		
Phase 6	128																		
Annual Totals for all Phases		31				172				110				29				342	

APPENDIX C

Summary of the Landscape Sensitivity and Capacity Evidence relating to Existing Commitment Sites EC3 (Great Leighs), EC4 (Boreham) & EC5 (Bicknacre)

Existing Commitment Site 3 Great Leighs

Great Leighs Landscape and Visual Context



Document EB100A

This Study Site lies within the north western edges of the Terling Farmland Plateau Landscape Character Area (B17) as described by the Chelmsford LCA 2006 (Chelmsford LCA).

Parcel GLP4 is judged to be of **moderate overall landscape sensitivity and moderate value with a medium landscape capacity** to accommodate low rise residential and employment development. Here capacity is subject to careful siting/ design of development and the retention/ implementation/ enhancement of hedgerows, hedgerow trees and woodland in keeping with the character of the landscape.

Settlement/ Locality	Parcel	Landscape Character Sensitivity	Visual Sensitivity	Overall Landscape Sensitivity	Landscape Value	Overall Landscape Capacity
	GLP4	Moderate	Moderate	Moderate	Moderate	Medium

Planning and Land Management Guidelines

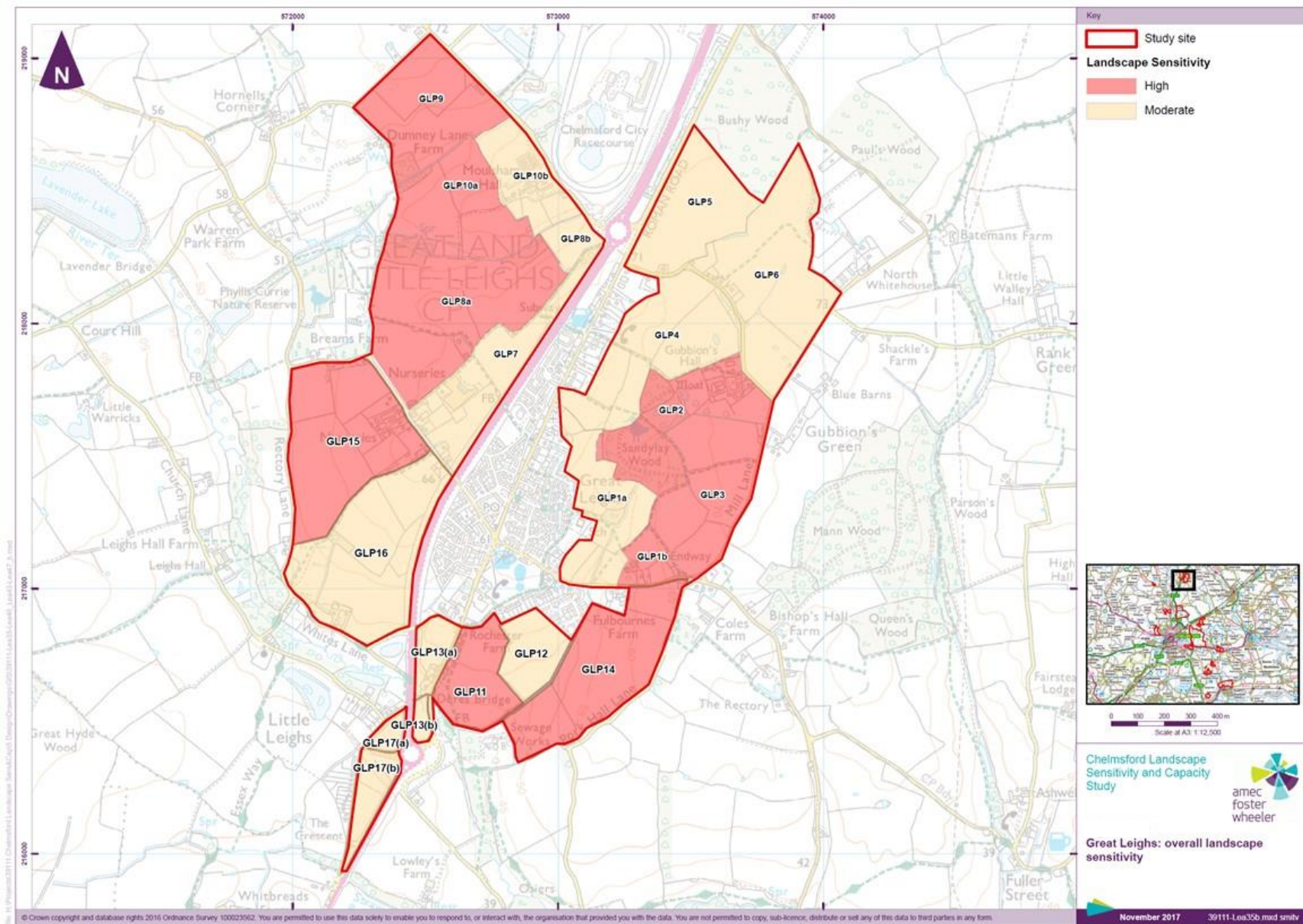
Suggested Planning Guidelines of the Chelmsford LCA of relevance include:

- Ensure that new build is in keeping with character.
- Conserve and enhance the landscape setting of settlements.
- Ensure any new development within farmland is small-scale, responding to historic settlement pattern, landscape setting and locally distinctive building styles.

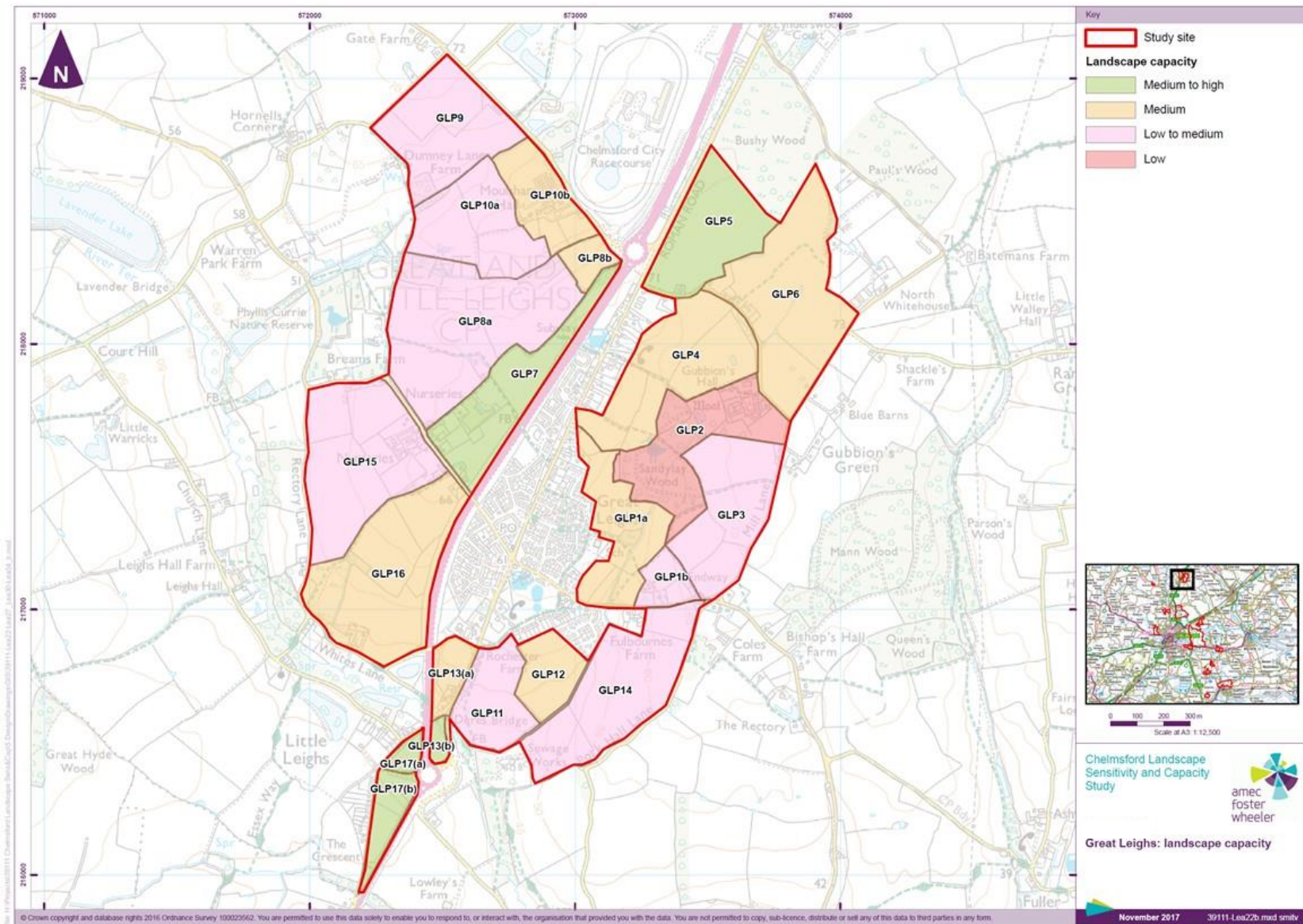
Suggested Land Management Guidelines of relevance include:

- Conserve and enhance existing hedgerow network and strengthen through planting appropriate to local landscape character.
- Conserve and manage areas of semi-natural woodland as important historical, landscape and nature conservation features.
- Conserve and promote the use of building materials, which are in keeping with local vernacular/landscape character.

Great Leigs Landscape Sensitivity

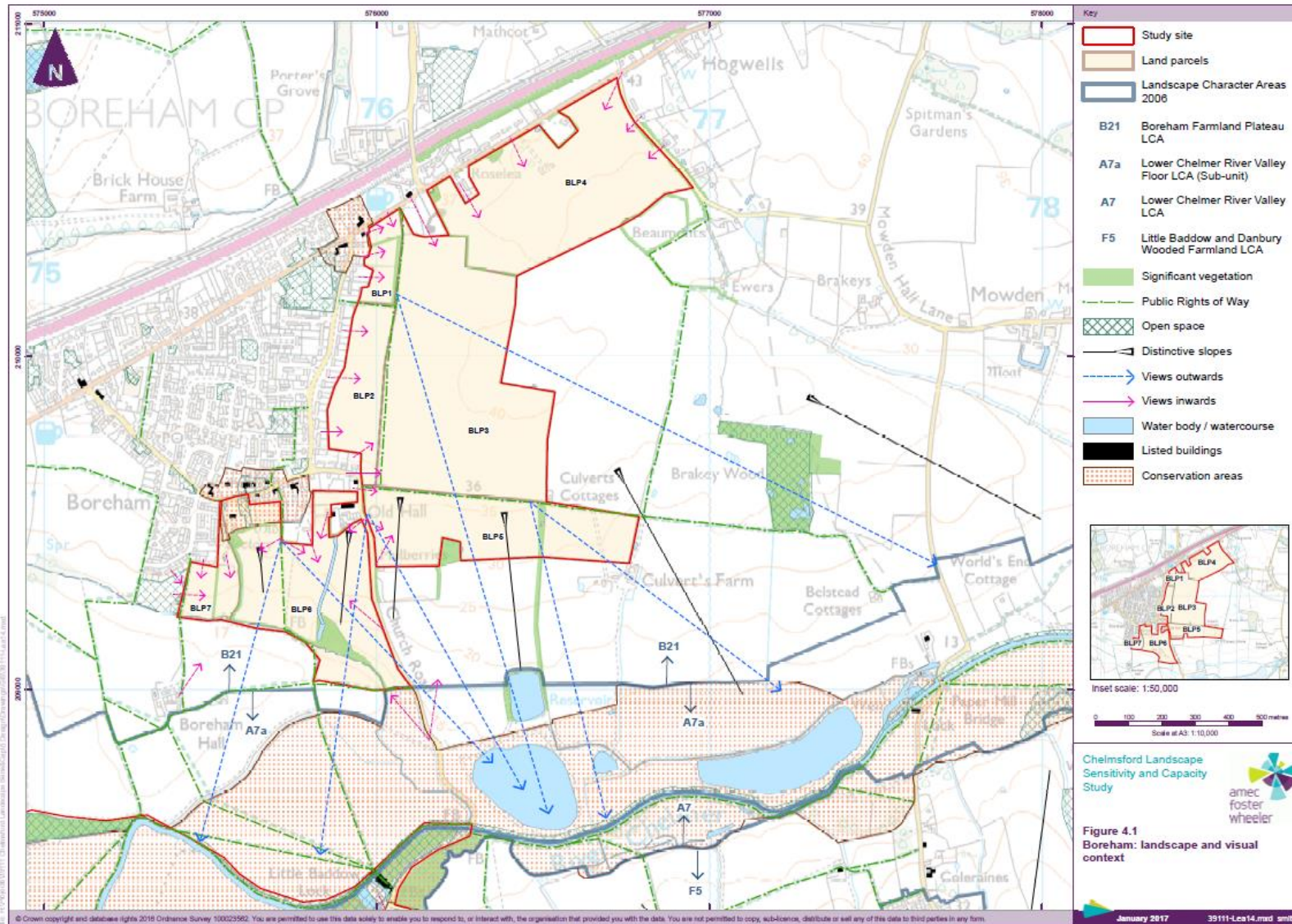


Great Leighs Landscape Capacity



Existing Commitment Site 4 Boreham

Boreham Landscape and Visual Context



Document EB100A

This Study Site is located to the east of the village of Boreham. The entire area lies within the southern part of the Boreham Farmland Plateau Landscape Character Area (B21) as described by the Chelmsford LCA 2006 (Chelmsford LCA).

Parcel BLP2 is judged to be of **moderate overall landscape sensitivity and low value with a medium to high landscape capacity** to accommodate low rise residential and employment development. Here capacity is subject to careful siting/ design of development and the implementation of new landscape framework of hedgerows, hedgerow trees and wooded copses in keeping with the character of the landscape. Key characteristics / qualities to be safeguarded, recommendations for mitigation and guidelines:

- Retain and strengthen existing boundary hedgerows with new hedgerows and tree planting (hedgerow trees / copses).
- Public Rights of Way – retain and implement physical and green buffers to minimise impacts on views and visual character.
- Residential properties on the settlement edge – implement physical and green buffers to minimise impact on views.
- Provide a positive new eastern settlement edge (softened and well integrated into the countryside).

Settlement	Land Parcel	Landscape Character Sensitivity	Visual Sensitivity	Overall Landscape Sensitivity	Landscape Value	Overall Landscape Capacity
Boreham	BLP2	Moderate	Moderate	Moderate	Low	Medium to High

Planning and Land Management Guidelines

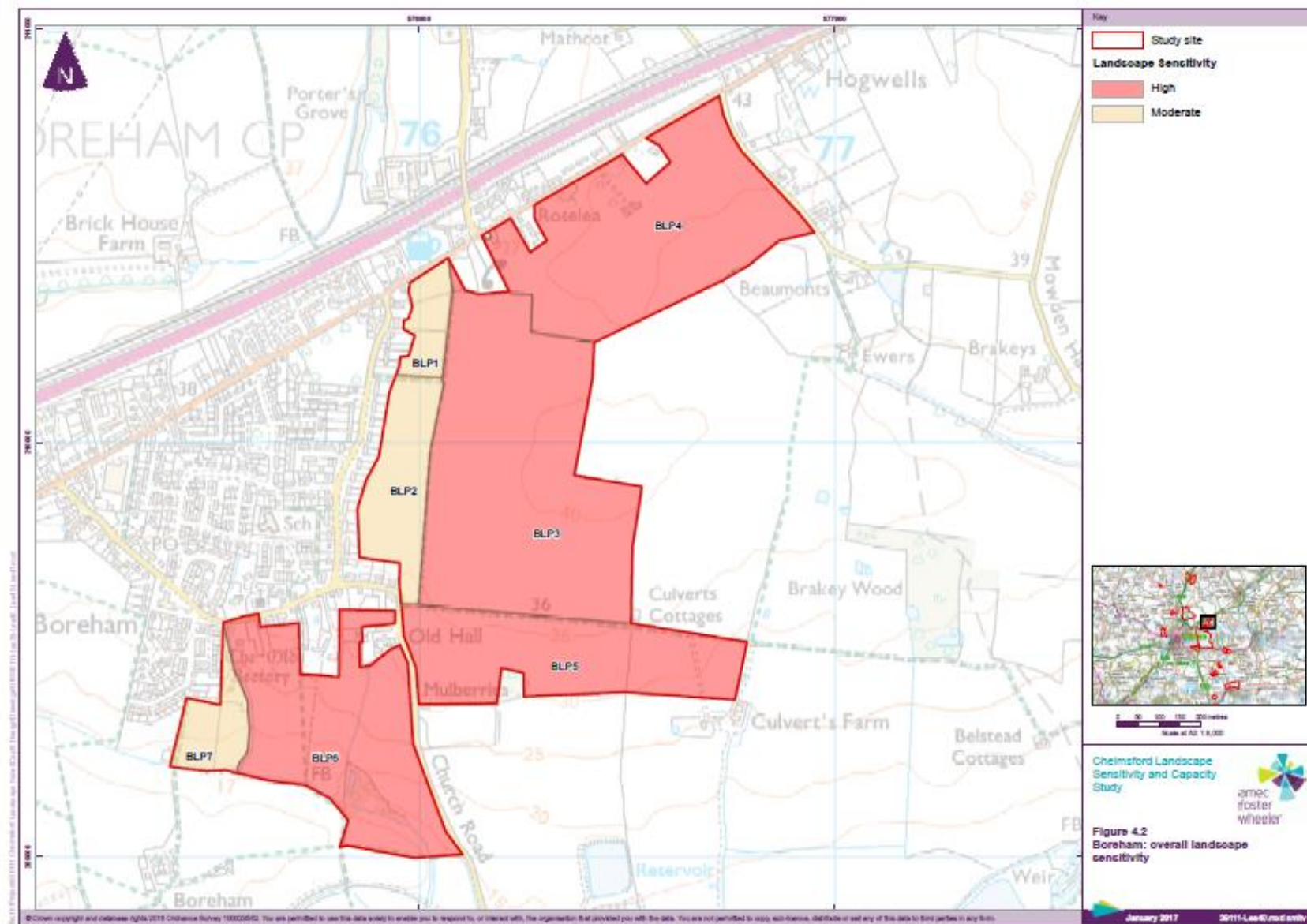
Suggested Planning Guidelines of the Chelmsford LCA of relevance include:

- Consider the visual impact of new residential development and farm buildings in the surrounding agricultural fields.
- Ensure any new development within farmland is small-scale, responding to historic settlement pattern, landscape setting and locally distinctive building styles.

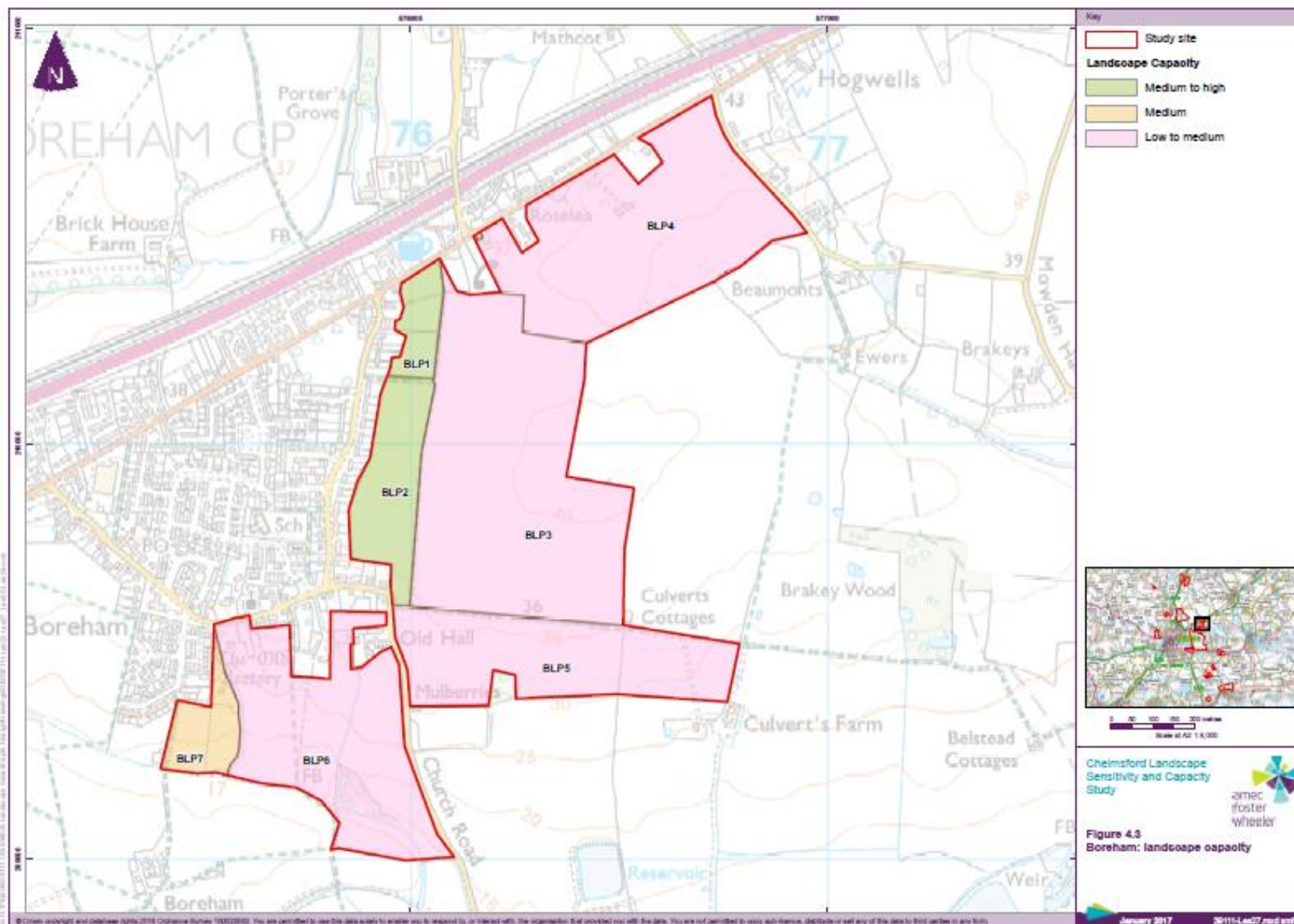
Suggested Land Management Guidelines of relevance include:

- Conserve and enhance existing hedgerow network and strengthen through planting appropriate to local landscape character.
- Conserve and manage areas of ancient and semi-natural woodland as important historical, landscape and nature conservation features.
- Conserve and promote the use of building materials, which are in keeping with local vernacular/landscape character.

Boreham Landscape Sensitivity

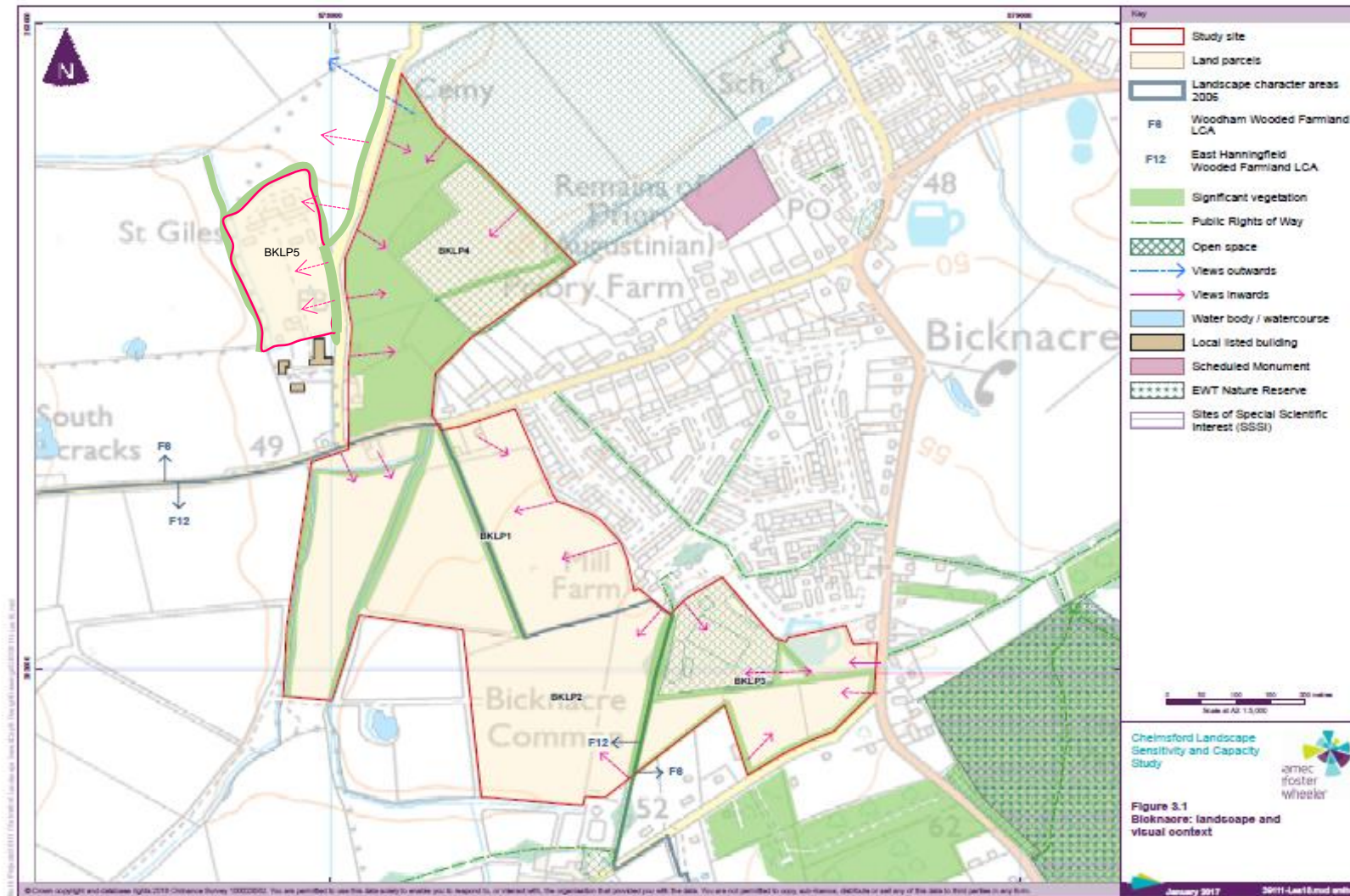


Boreham Landscape Capacity



Existing Commitment Site 5 Bicknacre

Bicknacre Landscape and Visual Context



This Study Site is located to the northwest of Bicknacre village off Moor Hall Lane within the south edge of the Woodham Wooded Farmland LCA (F6). The site is previously developed with low to medium density housing.

Parcel BKLP5 is judged to be of **low to moderate overall landscape sensitivity, low to moderate landscape value with a medium to high landscape capacity**, reflecting its previously developed character but the need for development to pay heed to the context of the site.

Settlement/ Locality	Parcel	Landscape Character Sensitivity	Visual Sensitivity	Overall Landscape Sensitivity	Landscape Value	Landscape Capacity
Bicknacre	BKLP5	<u>Low</u> to Moderate	Moderate	Low to <u>Moderate</u>	<u>Low</u> to Moderate	Medium to High

Planning and Land Management Guidelines

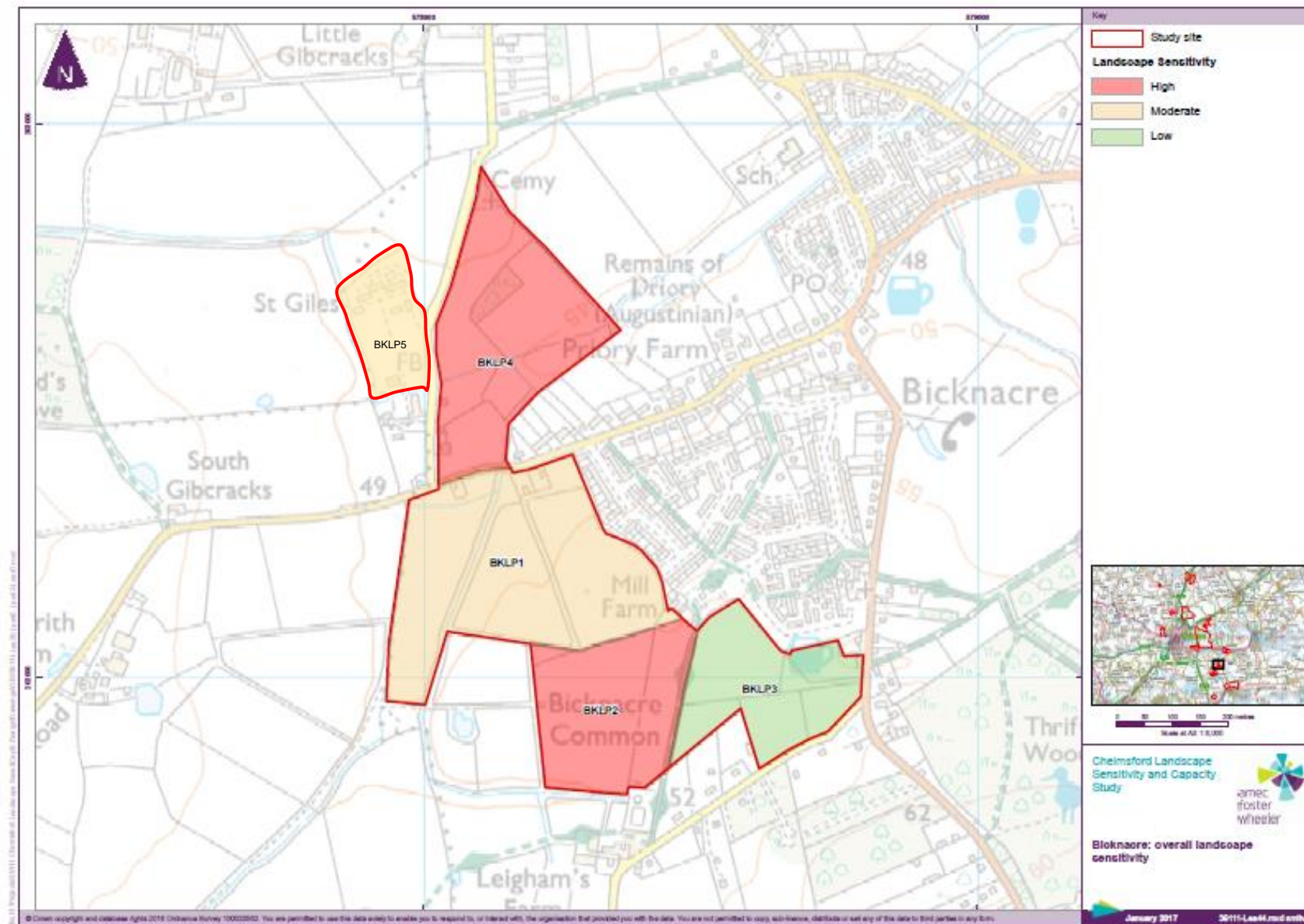
Suggested Planning Guidelines for LCA F6 of relevance include:

- Ensure any appropriate new development responds to historic settlement pattern and uses materials that are appropriate to local landscape character. Such development should be well integrated with the surrounding landscape.

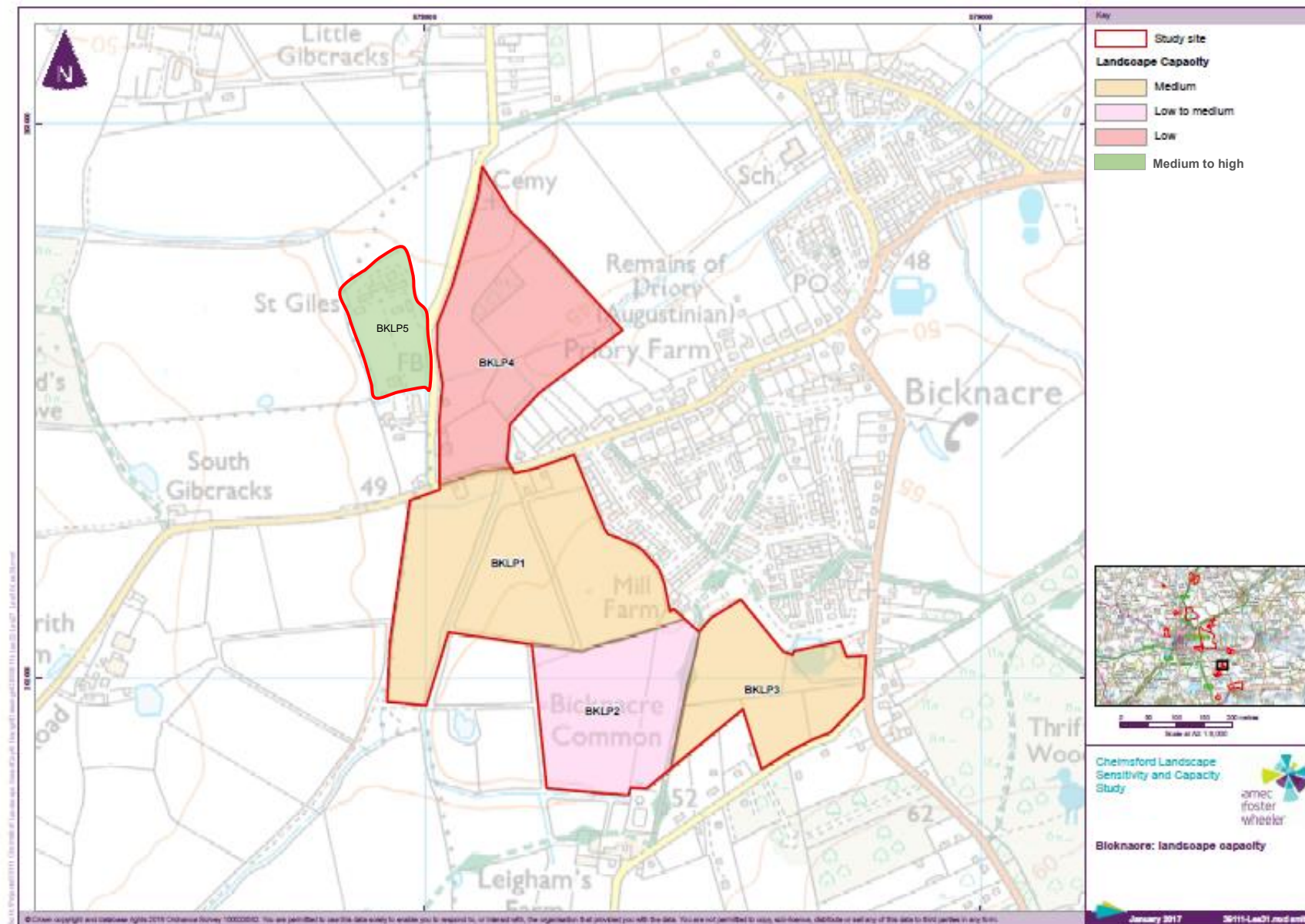
Suggested Land Management Guidelines for LCA F6 of relevance include:

- Conserve and enhance the existing hedgerow network where gappy and depleted especially on property boundaries.
- Conserve, manage and enhance semi-natural and ancient woodland as important heritage, nature conservation and landscape features.
- Conserve historic lanes.
- Introduce a planting management programme to ensure future trees within hedgerows will succeed mature trees.

Bicknacre Landscape Sensitivity with Existing Commitment Site EC5 (parcel BKLP5)



Bicknacre Landscape Capacity with Existing Commitment Site EC5 (parcel BKLP5)



Local Landscape Character Description

The site comprises low to medium density housing set within a large plot, in turn within the Woodham Wooded Farmland LCA (F6) which is characterised by fragmented woodland, tree enclosed fields and small/medium-sized fields in arable, pasture and common use.

Visual Context and Characteristics

The site is open to views from Moor Hall Lane along the southern part of its eastern boundary, otherwise visually enclosed by boundary planting to the north and west. To the south, the site abuts detached residential properties. Public views into the site are restricted to Moor Hall Lane to the east.

Landscape Sensitivity to Development

Parcel BKLP5 is atypical of the LCA character, being a developed plot of low to medium density housing within the wider countryside and development has been largely kept to the north and west, giving a semi-wooded buffer with Moor Hall Lane. However, the site is set within attractive wooded pasture to the north and west. Landscape character sensitivity is low to moderate

Visual Sensitivity to Development

Whilst the site comprises low to medium density housing, it is set within a large plot which could be over-developed for this relatively sensitive location. Reflecting the current density of development and sensitive wider context, visual sensitivity is judged to be moderate, reflecting the need to mitigate a redeveloped footprint.

Landscape Value

The site is developed for residential use with no inherent landscape value. Landscape value is judged to be low.

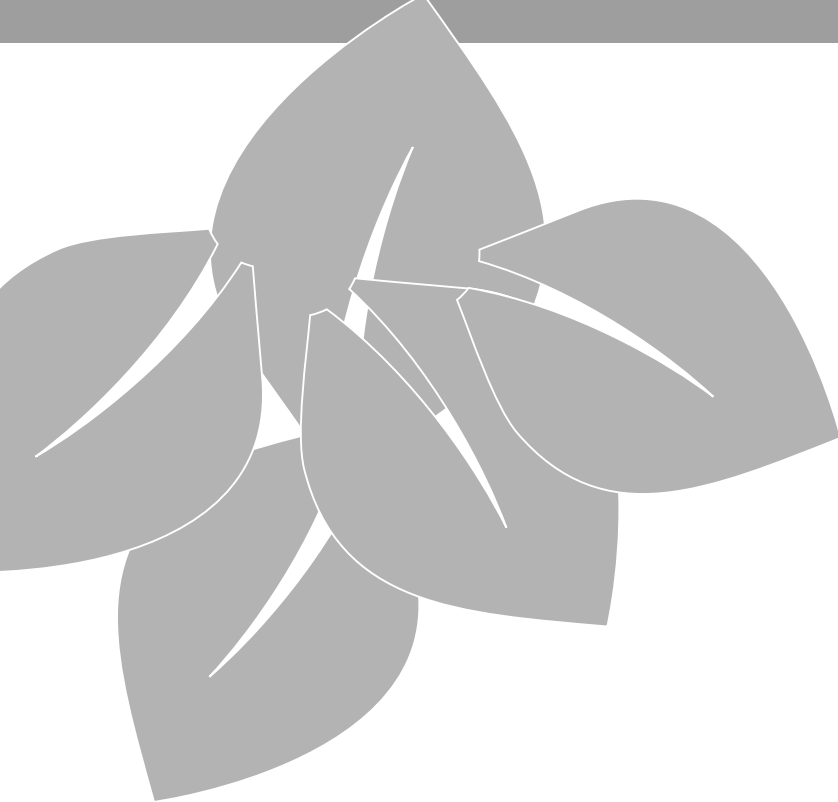
Overall Sensitivity and Value Summary Table for Land Parcel BKLP5

Landscape Character Sensitivity	
1 Representativeness of character	Low to moderate – although a developed site, the size of the plot means that the context for Moor Hall Lane has been partially retained.
2 Condition of elements and features	Low – declining boundary vegetation along Moor Hall Lane.
3 Nature and complexity of landform	Moderate – flat, simple landform.
4 Scale and pattern of landscape	High – small scale with simple pattern.
5 Historic features and sense of time-depth	Low – no evidence of historic features and limited sense of time depth apart from retention of context for Moor Hall Lane.
6 Presence of natural elements	Moderate – development is set back from Moor Hall Lane which makes a contribution to character.

7 Type of existing development	Low – developed with low to medium density housing.
8 Relationship to settlement edge	Moderate – set apart from Bicknacre village, but adjoins residential properties immediately to the south.
Visual Sensitivity	
1 Openness and inter-visibility	Moderate – partially open with moderate levels of intervisibility.
2 Views available	Low to Moderate – views in from Moor Hall Lane, view views restricted by buildings and boundary vegetation.
3 Potential for mitigation	Moderate – retention of the set-back of development from Moor Hall Lane would help to retain a sense of openness and sensitivity to Moor Hall Lane.
Landscape Value	
1 Distinctiveness of character	Low to Moderate – whilst of inherently of limited character, the site lies within an area of distinctive local character and scenic quality.
2 Quality and condition of elements and features	Low – landscape elements (notably the boundary hedgerow/tree groups along Moor Hall Lane) in declining condition
3 Scenic value and aesthetic appeal	Low to Moderate – presents low aesthetic appeal, although the context for Moor Hall Lane has been retained.
4 Presence of cultural, historic or nature conservation associations	Low – of no apparent cultural heritage or nature conservation value.
5 Recreational opportunities	Low – no public access.
6 Levels of tranquillity	Moderate – part of wider, largely tranquil landscape to the east and west of Moor Hall Lane.

Conclusions on Overall Landscape Sensitivity and Landscape Capacity

Overall capacity is judged to be medium to high, reflecting the moderate landscape sensitivity and low landscape value of the site. The site is considered to be appropriate for residential development but with the caveat of attention to overall plot density and the setting of Moor Hall Lane by the retention of a substantial landscape buffer.



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