
Hearing Statement for Chelmsford City Council Local Plan Examination

**Matter 6b – Housing Provision in Growth Area 2 –
North Chelmsford**

**Statement of behalf of the Landowners of Land Parcel Site 5c, Great
Leighs**

Chelmsford City Council Local Plan Examination

Matters and Questions

Matter 6b – Housing Provision in Growth Area 2- North Chelmsford

This hearing statement relates solely to Site 5c, which forms part of the larger draft allocation referred to as Location 5 - Great Leighs, as shown on the Site Location Plan as provided as **Appendix 1**. As set out in the guidance note provided by the programme officer, this statement is limited to the issues and questions set out in the Matters, Issues and Questions published by the Planning Inspector. It relates to the representations previously made and new evidence that has arisen since the submission of those representations.

41. Are the housing site allocations in GA2 within Location 4: North East Chelmsford, Location 5: Great Leighs and Location 6: North of Broomfield justified and deliverable? In particular:

- a. Is the scale of housing for each site allocation, particularly the large new Garden Community for North East Chelmsford and the other Strategic Growth Sites, justified having regard to any constraints, existing local infrastructure and the provision of necessary additional infrastructure?***

The housing site allocations included within the Plan have been identified in order to meet the objectively assessed need for housing identified by Chelmsford City Council (CCC). This is in line with Paragraph 11 of the National Planning Policy Framework, which sets out that local planning authorities should meet Objectively Assessed Need (OAN) unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, or specific policies in the Framework indicate development should be restricted, for example if land is designated as a Green Belt.

Specifically in respect of Site 5c, the Council have allocated the site for 'around' 100 homes. To include 'around' is potentially misleading to members of the public and stakeholders because it is unclear what the range of residential units to be delivered could be and still satisfy the term 'around'.

As stated within our representations, this wording is restrictive and as with the overall housing requirement should be set out as a minimum. This will allow the site specific constraints and opportunities to be assessed through a planning application submission and the exact quantum of homes developed through this analysis and a design led approach.

The landowners have instructed Conisbee to undertake an assessment of the highways infrastructure and local drainage capacity. This will inform the overall quantum of development and will feed into the Masterplan, in accordance with the Council's masterplan procedure.

Specifically in respect of Site 5c and the identified constraints, there are no physical constraints on or in close proximity to the site that would prevent the sites from being deliverable. Whilst there is a listed building and scheduled monument (Gubbions Hall and moated site) to the east of the allocation and an ancient woodland to the south east, these can be preserved through the design approach of the development and will not render the sites undeliverable.

In addition, ECC and CCC consider there to be education capacity issues in respect of the availability of primary school places in the area that will affect the timing of delivery of the site. Whilst the landowners disagree with this assessment (see Section d), this will not affect the overall delivery of the site and is a matter of timing.

b. Is the housing trajectory realistic and are there any sites which might not be delivered in accordance with the timescale set?

We note that the housing trajectory contained within the 5 Year Housing Land Supply (April 2018) forecasts that the site is not going to come forward until at least 2023/24. The landowners of Site 5c consider there might be opportunity for this site to be delivered earlier than this, subject to addressing education and foul drainage matters. This is further discussed below.

c. Are the planning and masterplanning principles justified?

The masterplanning principles for Site 5c are split into three key areas and we set out below are comments in relation to those:

- 1) Main vehicular access to the site will be from Banters Lane or through Site EC3 via Main Road – the inclusion of access through site EC3 is welcomed and responds to representations made on behalf of the landowners at Regulation 19 stage
- 2) Provide a well-connected internal road layout which allows for bus priority measures.

The requirement for this site to include bus priority measures is too restrictive and given landownership constraints, the size of the allocation and the width of Banters Lane, it is unlikely that access for a bus will be possible through Site 5c.

It is proposed to access the southern part of the allocation through site EC3. This is designed to be a 5.5m wide carriageway (as approved under planning permission Ref. LPA Ref. 14/01791/MAT) granted in February 2017. As such, a bus route through Site 5c cannot be accommodated as the approved access and road width is inadequate.

It is also unlikely that it will be commercially viable for a bus company to divert buses through the site which currently travel along Main Road through the site.

There are existing bus stops along Main Road in close proximity to the site. These stops can be accessed via an existing public footpath, which will be upgraded as part of any planning application. With these measures in place, it is therefore considered unnecessary to require the bus service to be routed through the site as there is already very good access to existing services/stops on Main Road and this will be improved as part of any application. Moreover, the approved access arrangements do not allow for a bus route through site EC3. Further justification is provided in the note prepared by Conisbee appended to this statement at Appendix 3.

We therefore request that the policy is amended to state: Provide a well-connected internal road layout

- 3) Provide a coherent network of public open space, formal and informal sport, recreation and community space within the site.

Given the size of the allocation, it is not considered reasonable or justified to request provision of formal sport and community space on site.

We therefore request that these requirements are deleted and the policy amended to state: Provide a coherent network of public open space, informal sport and recreation within the site.

Any masterplanning principles that have not been identified above are considered to be acceptable and justified.

d. Are the specific development and site infrastructure requirements clearly identified for each site allocation, are they necessary and are they justified by robust evidence? Is any other infrastructure necessary for site delivery?

The Chelmsford Pre-Submission Local Plan is supported by infrastructure modelling contained within the Infrastructure Delivery Plan Update (EB 018B) and together with other policy requirements has been the subject of viability testing (EB 082A and EB 082B). The landowners of Site 5c consider that the detailed infrastructure, revenues and development costs, including but not limited to affordable housing, sewage treatment upgrade works and SUDs, foul drainage storage tanks and pumping station, and archaeological works, will need to be reviewed as part of the preparation and consideration of any planning application submission in accordance with paragraph 1.7 of the Chelmsford Infrastructure Delivery Plan June 2018 Update (EB 018B).

For the purposes of the Local Plan, the identified list of site infrastructure requirements within the site specific policy are considered acceptable. The development requirements are addressed below.

Foul Water Drainage

The Council as part of their response to the Regulation 19 consultation added the following text to the policy for Site 5c:

“Ensure appropriate waste water treatment provision, including any associated sewer connections”

This is not disputed by the landowners. As advised in our Regulation 19 representations, Anglian Water have identified that there are foul water capacity issues within the Great Leighs area. The landowners are investigating this further with Anglian Water but preliminary inquiries indicate that these capacity issues can be addressed through the provision of foul pumping stations on each site and/or off site mitigation works which will ensure the slow release of foul drainage at times when the sewage works have more capacity. Any future applicant will bear the cost of such infrastructure improvements. As such the foul drainage capacity issues are not considered to be an impediment to housing delivery on this site. This should form part of the Inspector's considerations.

Movement and Access

The transport implications of the proposed allocation of Site 5c (and the wider allocation for Great Leighs) have been considered by our transport consultant Conisbee. Their work to date shows that a suitable package of mitigation measures can be provided in association with the development of the site and there are no reasons that the site should not be allocated. The improvements to transport infrastructure and services to support the proposed development can be secured and delivered within the Local Plan. Should Site 5c come forward early in the plan period, then these measures will be secured as part of the planning application, subject to S106 and CIL tests. The supporting note from Conisbee at Appendix 3 summarises their findings to date.

There are a number of transport related infrastructure requirements set out in the emerging Local Plan and requirements for supporting facilities that will reduce the transport demand from the development of the site. These are:

- *Appropriate improvements, as necessary, to the local and strategic road network as required by the Local Highways Authority;*
- *Appropriate measures to promote and enhance sustainable modes of transport;*
- *New and enhanced cycle routes, footpaths, Public Rights of Way and bridleways where appropriate;*
- *Provide, or make financial contributions to, new or enhanced sport, leisure and recreation facilities; and,*
- *Financial contributions to delivery of the Chelmsford North East Bypass, early years and childcare, primary and secondary education as required by the Local Education Authority and community facilities such as healthcare provision as required by the NHS/CCG.*

The landowners have not raised concerns with these requirements in principle.

Historic and Natural Environment

Heritage

Gubbion's Hall moated site (Scheduled Monument) and the Grade II listed Gubbion's Hall are located to the east of Site 5c. There are also a number of Grade II listed former agricultural buildings and cottages which are situated in the vicinity of the site. Moat Wood is an ancient woodland which adjoins this heritage area to the south.

The proposed allocation seeks to secure an area of land to the west adjacent to Moat Wood to provide a landscaped buffer between the proposed residential development at Site 5c, the Ancient Woodland and Gubbion's Hall. This will preserve the setting of the heritage assets.

Whilst the landowners have no issue with the principle of providing the landscape buffer, they are concerned that the land will become landlocked and inaccessible as a result of it not being included in the allocation. In this regard, we request that this land is included in the allocation to enable the proper provision of the landscape buffer through the planning application process and ensure an appropriate maintenance regime can be secured accordingly. can be achieved and maintained accordingly (see Appendix 2). No residential development would be incorporated on this land.

We therefore request that the allocation boundary of 5c be amended in accordance with that suggestion at Appendix 2.

Minerals

The site is identified as being within a Minerals Safeguarding Area (MSA). Policy 8 of the Essex Minerals Local Plan (2014) seeks to protect MSAs and requires that non-mineral proposals provide a Minerals Resource Assessment to establish the extent of the mineral resource and whether it is of economic importance.

Whilst we note the requirements of the MSA, the whole of Site 5c is located within 100m of existing residential properties, wherein minerals extraction is prohibited. On this basis, the requirement for a MRA is not justified or practicable.

We therefore request that this part of the policy is deleted.

Education

The wider policy regime sets out how the existing local facilities would be supplemented by the provision of new primary school/nursery and neighbourhood centre on the Land to the West of Great Leighs (5a) and the new nursery on Land to the North of Great Leighs (5b).

Secondary school provision is in Braintree District to the north and in Chelmsford to the South and there are school bus services to the schools.

This provision ensures that there is/or will be range of facilities including primary schools, shops and employment opportunities in Great Leighs.

The supporting text to the strategic allocation sets out that:

A new school is proposed early on in the development on Site 5a: Great Leighs - Land at Moulsham Hall. It is essential that this school is available ahead of development of Site 5c: Great Leighs- Land north and south of Banters Lane.

As set out in our previous representations, restricting the delivery of housing on Site 5c until the new school on Site 5a comes forward will impact on the delivery of housing on the site, particularly as Site 5a is within a separate landownership and as such the timing on the delivery of this site cannot be guaranteed. Moreover, the delivery of the new school will be funded in part, by the financial contributions secured from the housing sites in the locality. Therefore, the delivery of housing on Site 5c is required to generate the contributions required to enable the school on Site 5a to be delivered.

In addition, we understand that Essex County Council have made provision for the extension of the existing school buildings to the south of Site 5c by 2022 in order to provide capacity from windfall development. This additional capacity could be utilised by the development of Site 5c which would mean that development could come forward early whilst contributing to the funding of the necessary infrastructure.

Given the forgoing, it is considered that this element of the policy wording is not justified. We request that flexibility should be incorporated into the policy wording to enable the delivery of Site 5c in advance of the new primary school on Site 5a. It should also be acknowledged that any planning permission would be granted subject to the provision of financial contributions towards education provision. Again, the planning system includes adequate controls to restrict the grant of planning permission if infrastructure requirements cannot be satisfied.

Consequently, this element of the supporting text should be amended as the policy wording already requires financial contributions. The landowners are working with CCC and ECC to ensure this can be addressed at the planning application stage.

Additional evidence

Following the submission of the Regulation 19 representations, the landowners have commissioned a study into the capacity of the existing primary schools within the vicinity of the site by EFM Ltd. This is attached as Appendix 4. This sets out that Great Leighs Primary School is an eight-class primary school, giving it a capacity of 240 places. It has one class per year group plus a second class at year 2. In January 2018, the School had 221 pupils (92.1% occupancy) and a catchment mainly from the village and the area immediately to the north up to and beyond the

A120. Despite the spare capacity, in excess of 22% of the primary school age children that live in Great Leighs choose to go to a school somewhere else. Conversely, a number of children travel in to the village each day to attend Great Leighs Primary School. Notwithstanding the exchange of pupils between areas, Essex County Council ("ECC") anticipate that net of new housing pupil numbers at Great Leighs Primary School will fall to 217 pupils by 2021/22.

In their publication Commissioning School Places 2017-2022, ECC identify two developments in the period to 2021/22 that could affect the forecast: Helvellyn; the conversion of an existing dwelling into 10 apartments and Land East of Main Road for 100 units (60 units in the period), which are assessed to require 12 places. This is forecast to leave 11 spare places. However, the ECC consultation response to the outline planning application for Land East of Main Road (27/10/2015) anticipates the provision of additional school places at White Court Primary School at Great Notley on the grounds that Great Leighs Primary School could not accommodate them.

Thus, the primary school need for site EC3 (Land East of Main Road) is planned to be provided twice – once at White Court School and in the projection for Great Leighs Primary School. Site 5c, in terms of impact on primary school places can be allocated one of the two extant mitigations attributed to site EC3: namely; the expansion of White Court School identified in the ECC consultation response to it; or, absorption into Great Leighs Primary School as set in the ECC Commissioning School Places 2017/22. EC3 does not need both. Site 5c can benefit from this additional capacity and does not require the delivery of the proposed primary school on Site 5a before it can be occupied.

This evidence, demonstrates that the early delivery of Site 5c can utilise existing surplus capacity within existing schools along with appropriate financial contributions (subject to S106 or CIL tests) towards the extension or provision of a new primary school at 5a.

We therefore request that the policy wording be amended to allow for Site 5c to come forward earlier.

e. Are the site boundaries justified?

In line with the representations submitted at Regulation 19 stage, we request that the boundary of Site 5c be extended to include the area of land located immediately to the south.

Gubbion's Hall moated site (Scheduled Monument) and the Grade II listed Gubbion's Hall are located to the east of Site 5c. There are also a number of Grade II listed former agricultural buildings and cottages which are situated in the vicinity of the site. Moat Wood is an ancient woodland which adjoins this heritage area to the south.

The proposed allocation seeks to secure an area of land to the west adjacent to Moat Wood to provide a landscaped buffer between the proposed residential development at Site 5c, the Ancient Woodland and Gubbion's Hall. This will preserve the setting of the heritage assets. However, this piece of land will become landlocked and inaccessible as a result of it not being included in the allocation. In this regard, we request that this area should be included in the allocation so that the landscape buffer can be provided and maintained accordingly. No residential development would be incorporated on this land and as such the ancient woodland would still be protected. This is shown on Appendix 2. No residential development would be incorporated on this land.

We therefore request that the allocation boundary of 5c be amended in accordance with that suggestion at Appendix 2.

The allocation as proposed, leaves an area of land to the west adjacent to Moat Wood to create a landscape buffer.

f. Will the site allocations in these locations achieve sustainable development?

Paragraph 8 of the NPPF (2018) states that "*the purpose of the planning system is to contribute to the achievement of sustainable development*". The allocation of Site 5c at Great Leighs could achieve this in the following ways:

- 1) Economic – allocating land which will result in housing growth in the village and the associated benefits from increased spending in local shops and other service providers, create construction jobs through the life of the development and provide a number of financial contributions, in addition to CIL contributions to the City, County Council and other stakeholders.
- 2) Social – the development will include affordable housing, a mix of housing tenure and size as well as provision for self-build properties in line with housing need. The developments will include open spaces, play space and pedestrian and cycle connections which will support the health and wellbeing of the future community, and integration with the surrounding village.
- 3) Environmental – the development will preserve the nearby listed buildings and ancient woodland. Any development will be designed to enhance biodiversity and mitigate against climate change.

The forgoing demonstrates that the allocation meets the three components of sustainable development.

g. Are any amendments necessary to ensure soundness?

The amendments requested in relation to the provision of bus priority measures are required to ensure soundness as provision of a bus route on Site 5c is not possible.

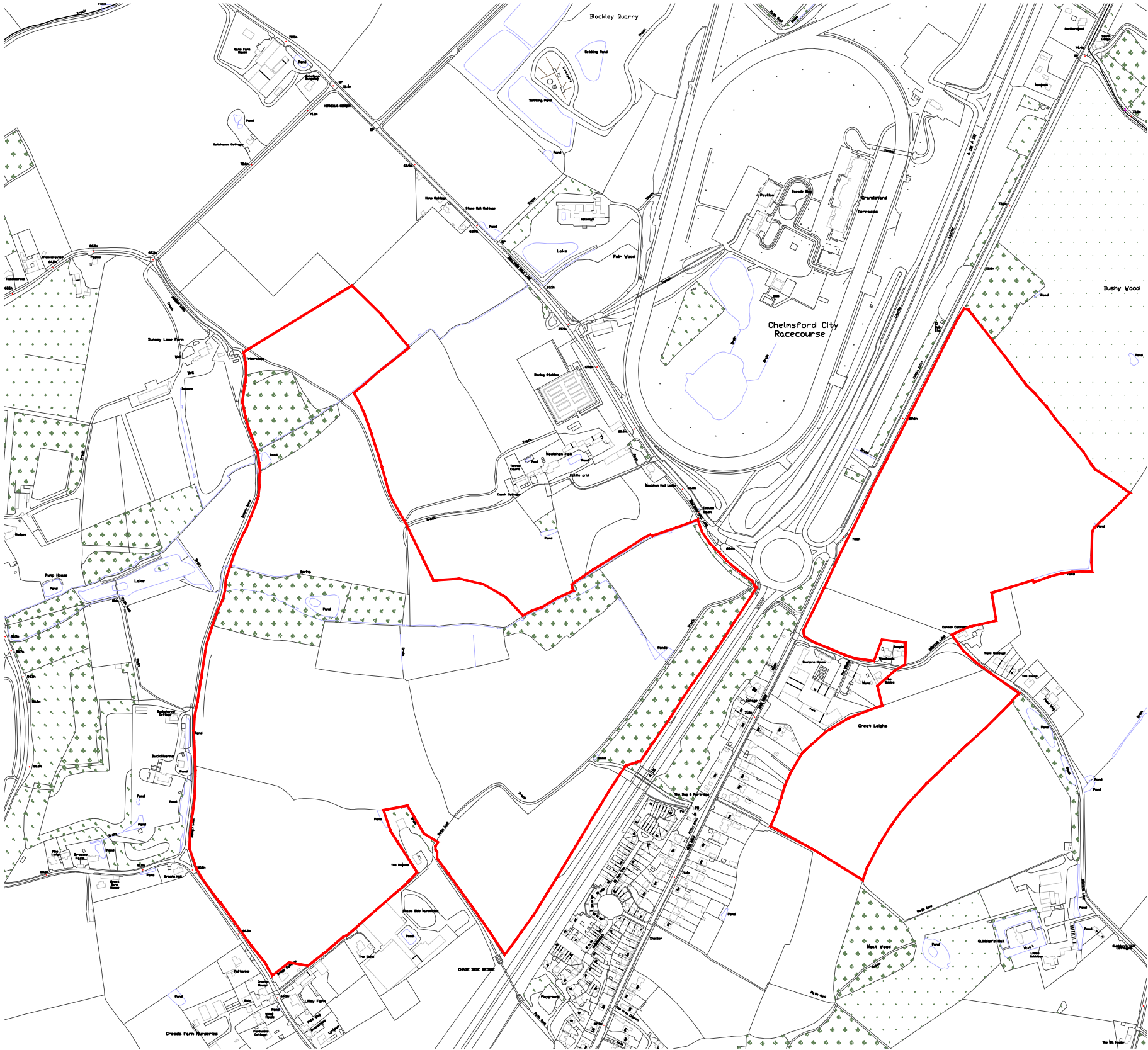
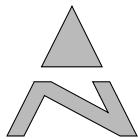
Appendices

Appendix 1: Site Location Plan

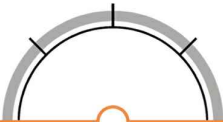
Appendix 2: Suggested amended red line for allocation

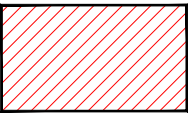
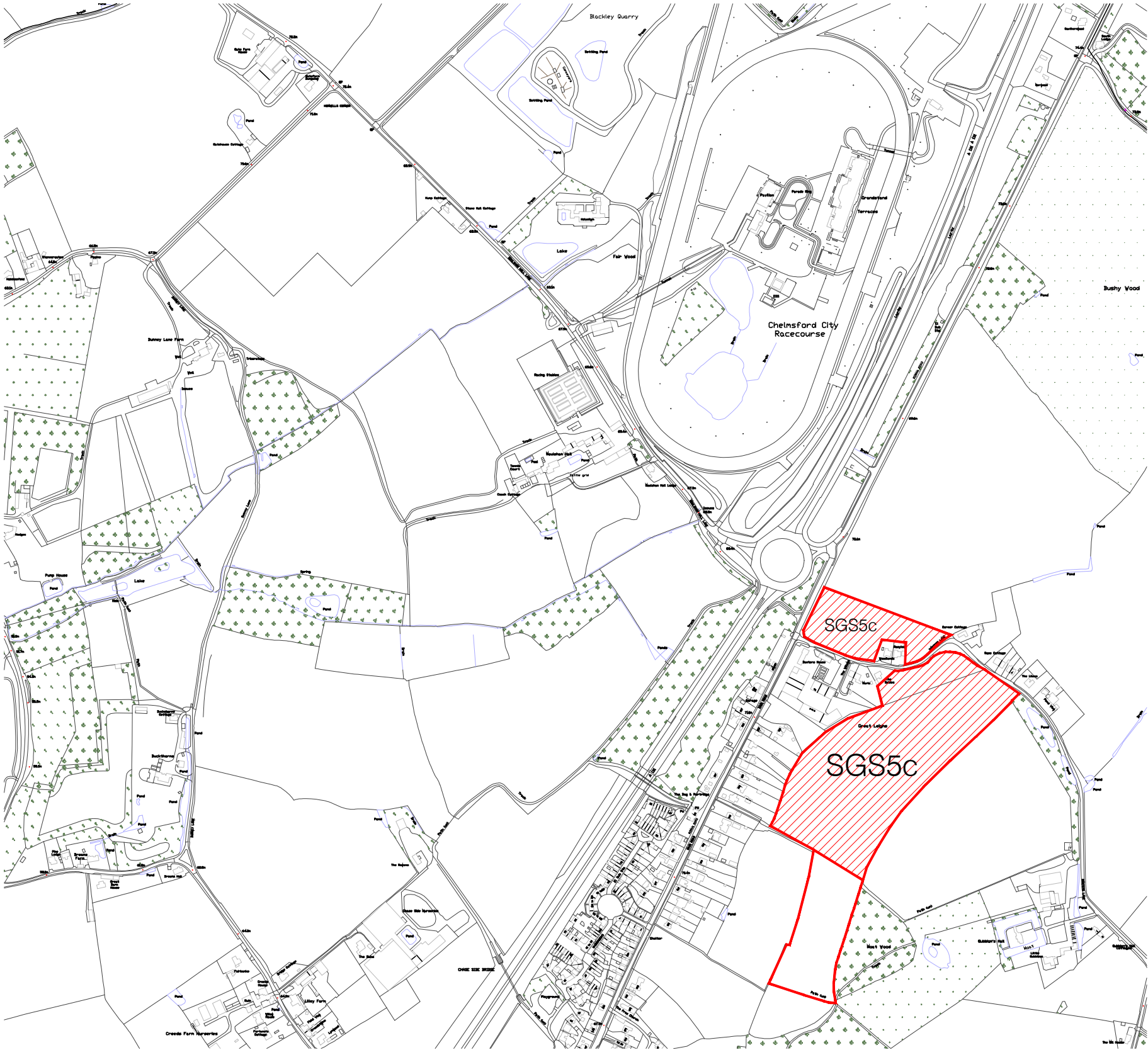
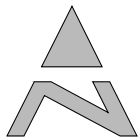
Appendix 3: Conisbee Project Note

Appendix 4: EFM Report- Primary School Provision



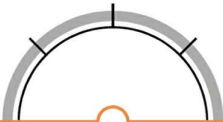
GREAT LEIGHS SITE LAYOUT -
1539 - SL001





ALLOCATION AREA

GREAT LEIGHS LAND HOLDINGS - 5C
1539 - SL004



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PROJECT NOTE

Project no:	180277
Project:	Draft Strategic Allocation 5, Great Leighs
Date:	15 th November 2018
Author:	Helen Jenkins
Subject:	Transport and highways impact of site 5c - non-technical summary

1.0 INTRODUCTION

- 1.1.1 A Transport Assessment has been produced to assess the impact on the surrounding transport network for the three sites forming the Draft Strategic Allocation 5.
- 1.1.2 This note considers the impact of site 5c, which is made up of three separate parcels of land, two south of Banters Lane and one to the north. It is proposed to provide approximately 100 residential dwellings on site 5c.

2.0 ACCESS STRATEGY

2.1.1 Access to the three parcels of land is recommended as follows:

- Site 5c (north of the recently consented site off Main Road) - It is proposed to provide access via the proposed access onto Main Road (approved as part of the recently consented scheme to the south). This junction has been tested to ensure it has sufficient capacity to accommodate traffic from the additional units.
- Site 5c (south of Banters lane) – This parcel of land fronts Banters Lane. There are a number of options for access to this site, including either directly on to Banters Lane or connecting through to the parcel of land to the south.

- Site 5c (north of Banters Lane) - It is proposed to provide a simple priority junction onto Main Road.

2.1.2 All accesses have been:

- Designed in accordance with the appropriate standards, including the principles set out in Manual for Streets and the Essex Design Guide;
- Have appropriate visibility splays;
- Have been tested to ensure they have sufficient capacity; and,
- Vehicle swept path analysis carried out to ensure that there is appropriate provision for manoeuvring of large vehicles.

3.0 IMPACT ON HIGHWAY NETWORK

3.1.1 In order to assess the impact of the proposed development on the surrounding highway network, this Transport Assessment has analysed the capacity of the site accesses and the following five junctions in and around Great Leighs:

- Boreham Road/Main Road/School Lane crossroads junction;
- Main Road/Aragon Road/Fayrewood Drive crossroads junction;
- Main Road/London Road priority junction;
- A131 North roundabout junction; and,
- A131 South roundabout junction

3.1.2 The analysis demonstrates that all junctions are predicted to operate well within capacity with acceptable levels of queueing in the future scenario. This includes growth and committed development. The capacity testing also included likely traffic associated with sites 5a and 5b, which form part of the Draft Strategic Allocation 5. It is considered that, overall, the development can be accommodated in safety and capacity terms on the highway network.

3.1.3 Traffic along Boreham Road is likely to increase by approximately five vehicles per hour during the peak periods. This is an increase of less than 2%. Given that daily and seasonal fluctuations of 5% are typical, it is considered that, in highway capacity and safety terms, this can be accommodated.

4.0 SUSTAINABILITY OF SITE'S LOCATION

4.1.1 The site is located in and around the settlement of Great Leighs. Great Leighs is well served with local facilities including a primary school, Post Office and shop, place of worship, pubs and green space. It is located on an important public transport corridor, which is well served by buses. Great Leighs is categorised as a key defined settlement '*Such settlements are large in area and population with increased accessibility and offer a good range of services and facilities*'.

4.2 Pedestrians

4.2.1 In terms of pedestrian trips, it is recommended that improved routes are provided to link site 5c to the centre of Great Leighs, including a pedestrian footway along the eastern side of Main Road, fronting site 5c to connect with the footways to the south.

4.3 Cyclists

4.3.1 There are two cycle routes that run through Great Leighs, providing access to Colchester, Chelmsford, Stansted, Braintree and Witham.

4.4 Public transport

4.4.1 Bus services run through the centre of Great Leighs providing access between Colchester, Braintree and Chelmsford. These services run along Main Road, which provides public transport access for the residential areas along both sides. There is likely to be an increase in public transport trips associated with the developments of fewer than 10 in each peak period. All parcels of site 5c are within walking distance to this service.

4.4.2 The draft policy recommends that a well-connected internal road, which allows for bus priority measures, be provided through site 5c. Bus priority measures are usually provided to give buses priority over other vehicles in congested road networks and typically include bus lanes, bus only streets, bus gates and priority signaling at traffic lights.

4.4.3 It is considered that diverting the existing bus route through site 5c disadvantages the existing residents of Great Leighs and is not necessary as this site benefits from good access to Main Road. In any event, bus priority measures are not appropriate for the level of traffic flow typically experienced on a residential estate.

4.4.4 The routes to the Main Road bus stops, include:

- Consented Main Road access (for the recently consented development to the south of 5c);

- An existing pedestrian connection between the site and Main Road. It is proposed to improve this footpath; and,
- Proposed access to Main Road to the north of Banters Lane.

5.0 CONCLUSIONS

- 5.1.1 Overall, based on the above, it is considered that site 5c can be accommodated in capacity terms within the existing transport network.



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CHELMSFORD DRAFT LOCAL PLAN

Regulation 19 – Publication Draft

January 2018

Strategic Growth Site 5c

Land North and South of Banters Lane Great Leighs

Primary School Provision



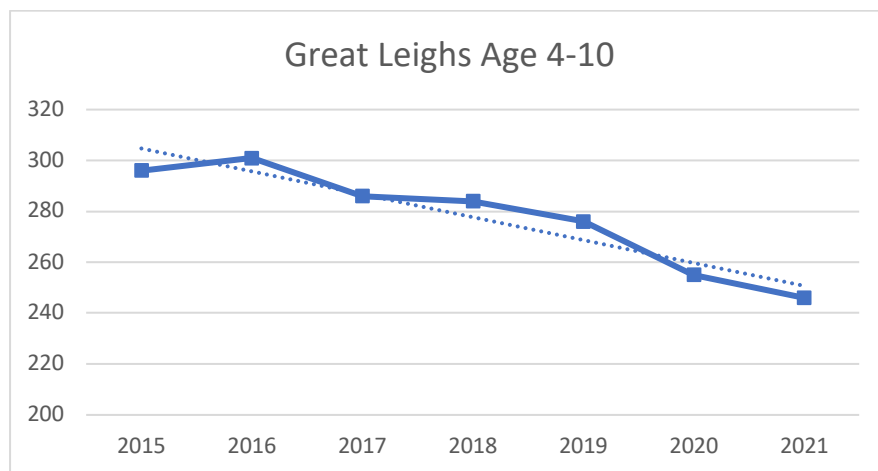
1 New Local Plan allocation 100 homes

1.1 Essex County Council assess this site to be yielding 0.3 primary school children per family house. That is 30 children in total.

2 Great Leighs

2.1 Great Leighs is a village with, at June 2018, 930 residential addresses¹ and, at mid-2017, 2,768 people.² It has a primary school age population of 286 children. Based on no dwelling growth, the number of children in this age cohort is due to fall to 246 by 2021.

	Age0	Age1	Age2	Age3	Age4	Age5	Age6	Age7	Age8	Age9	Age10
	28	29	35	35	39	38	42	37	50	43	37
2017					286						
2018				284							
2019			276								
2020		255									
2021	246										



Graph 1. Great Leighs Population age 4-10 (ONS BYOA by OA mid 2015, mid 2016 & mid-2017)
Mid-2017 rolled forward

2.2 Great Leighs has a primary school.

¹ Royal Mail Postcode Address File

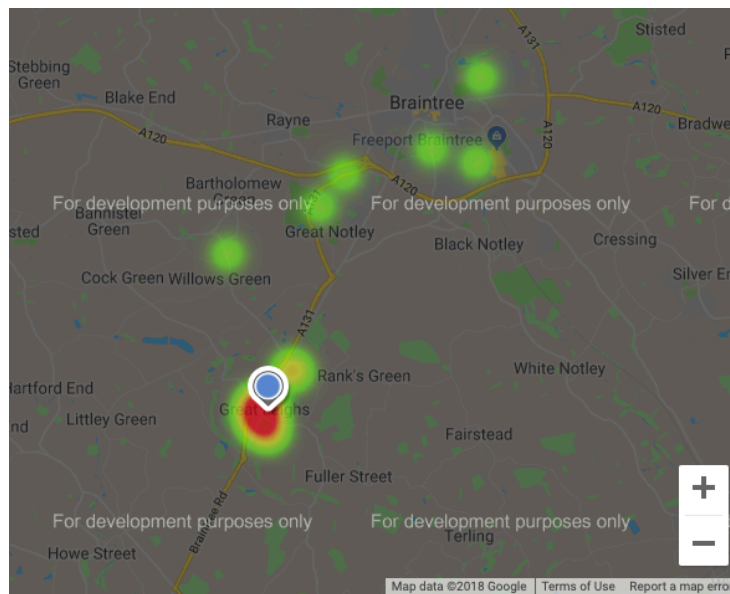
² ONS Population by Year of Age by Census Output Area



3 Great Leighs Primary School

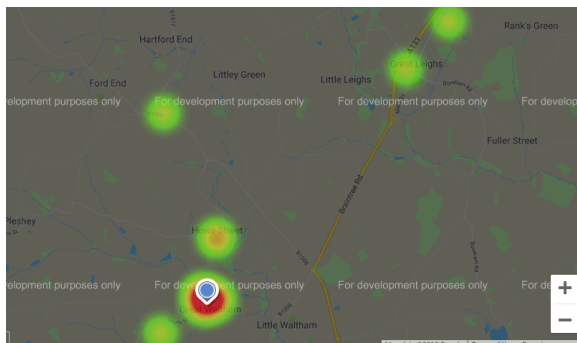
3.1 Great Leighs Primary School is an eight-class primary school, giving it a capacity of 240 places. It has one class per year group plus a second class at year 2.³

3.2 As at January 2018, the School had 221 pupils (92.1% occupancy) and recruited mainly from the village and the north up to and beyond the A120.

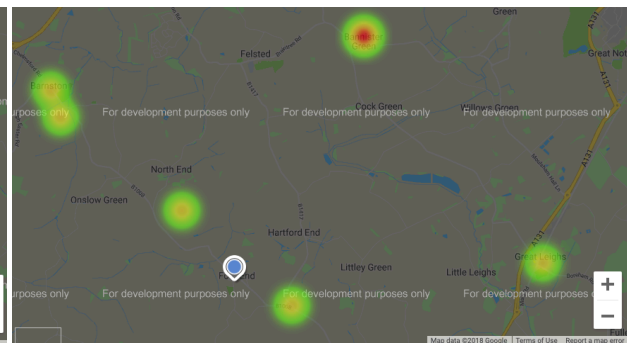


Admissions Heat Map (tutorhunt.com – DfE PLASC data 2018)

3.3 Other primary schools in the area admit pupils from the village.

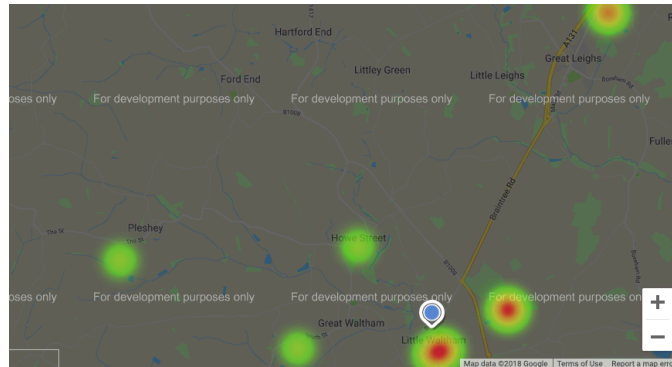


Great Waltham Primary



Ford End Primary

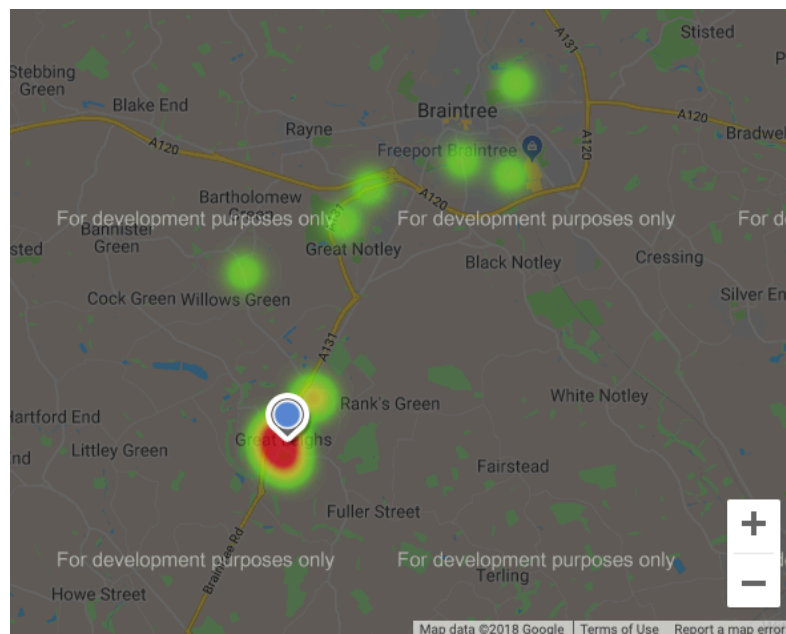
³ School website



Little Waltham Primary

3.4 Despite the spare capacity, something in excess of 22% of the primary school age children resident in the village choose to go to a school somewhere else.

3.5 Conversely, a number of children travel in to the village each day to attend Great Leighs Primary School.



Great Leighs Primary School

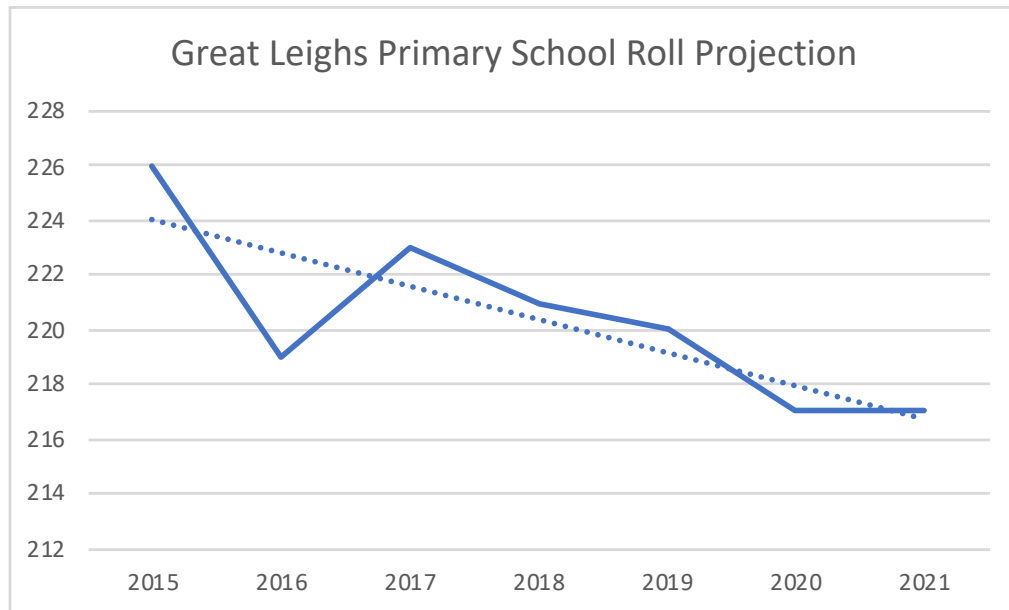
3.6 Notwithstanding the exchange of pupils between areas, Essex County Council ("ECC") anticipate that net of new housing pupil numbers at Great Leighs Primary School will fall to 217 by 2021/22.⁴ ECC identify two developments in the period to 2021/22 that could affect the forecast: Helvellyn; the conversion of an existing dwelling into 10 apartments⁵

⁴ ECC Commissioning School Places 2017-2022

⁵ 16/00520/FUL



and Land East of Main Road for 100 units (60 units in the period), which are assessed to require 12 places. This is forecast to leave 11 spare places.⁶ However, the ECC consultation response to the application at Main Road (27/10/2015) anticipates adding places to White Court Primary School at Great Notley on the grounds that Great Leighs Primary School could not accommodate them.



Graph 2

3.7 Thus, EC3 (Land East of Main Road) is planned to be provided twice – once at White Court School and in the projection for Great Leighs Primary School.

4 Chelmsford Draft Local Plan

Strategic Growth Site Areas 5a; 5b; 5c; and EC3

4.1 The development allocations are:

5a	Land at Moulsham Hall	750 dwellings
5b	Land East of London Road	250 dwellings
5c	Land North and South of Banters Lane	100 dwellings
EC3	Land East of Main Road	100 dwellings

⁶ Ibid



4.2 In brief: site 5a includes the provision of a new primary school;

- site 5b is specialist residential homes for older persons;
- site 5c includes a policy justification restriction preventing the site coming forward prior to the availability of the new primary school (7.273); and
- site EC3 is an existing commitment.

4.3 The Draft Local Plan anticipates delivery as follows⁷:

	20/21	21/22	22/23	23/24	24/25	25/26	26/31	31/36
Site 5a					72	70	356	252
Site 5b		70	100	70	10			
Site 5c					70	30		
Site EC3			100					

4.4 Site 5b can be discounted from any assessment of primary school need as it is entirely older persons housing.

4.5 Site 5c, which is interchangeable with site EC3, in terms of impact on primary school places can be allocated one of the two extant mitigations gifted to EC3: namely; the expansion of White Court School identified in the ECC consultation response to it; or, absorption into Great Leighs Primary School as set in the ECC Commissioning School Places 2017/22. EC3 does not need both and site 5c does not need the delivery of the proposed primary school on site 5a.

5 The New Primary School

5.1 A new state-funded primary school usually opens from the bottom up, opening in its first year to a cohort of 4-year olds (who attain 5 years of age during that school year).^{8 9}

⁷ Growth Area 2 and Existing Commitments with Planning Permission (Page 282)

⁸ Of 32 new primary schools that opened in 2016 and 2017; all opened solely as a Reception class.

⁹ Section 8 Education Act 1996 as amended by section 52 Education Act 1997 which inserted the start date of the school term preceding attaining the age of five years. Hence pupils starting primary school are 4 years of age.



5.2 On a desktop average basis, the 72 dwellings projected for Site 5a for 2024/25 will contain three primary school age children per year of age. $\frac{72 \times 0.3}{7} = 3.0857$ of which

perhaps two will be expected to start school in September 2024. Way too few to trigger a new school. The following year, prior to September 2025 the trajectory indicates circa 105 occupations and perhaps 5, ready to start school. Again, too few.

5.3 The 'rule of thumb' for opening a new primary school is circa 25 four-year olds. (In fact, for 2017, across England it was closer to 30 pupils). In practice, it is 300-350 occupations of new housing. For Site 5a, this is, with an even trajectory, probably 2029/30.

5.4 The supporting clauses to Policy 5c contradict this. 7.269 says; "100 homes expected to be delivered between 2024/25 and 2025/26". But, 7.273 says; "It is essential that this school [the primary school on Site 5a] is available ahead of development of Site 5c:".

6 Conclusions

6.1 The supporting clauses to Site 5c are clearly wrong:

- (a) because they are contradictory;
- (b) because no account has been taken of the double count in respect of Site EC3;
- (c) the reality of falling child numbers in Great Leighs' existing stock housing;
- (d) the proportion of Great Leigh's primary school age children that secure a school place somewhere else; and,
- (e) the degree of exchange of pupils between Great Leighs, other villages and as far as Braintree.