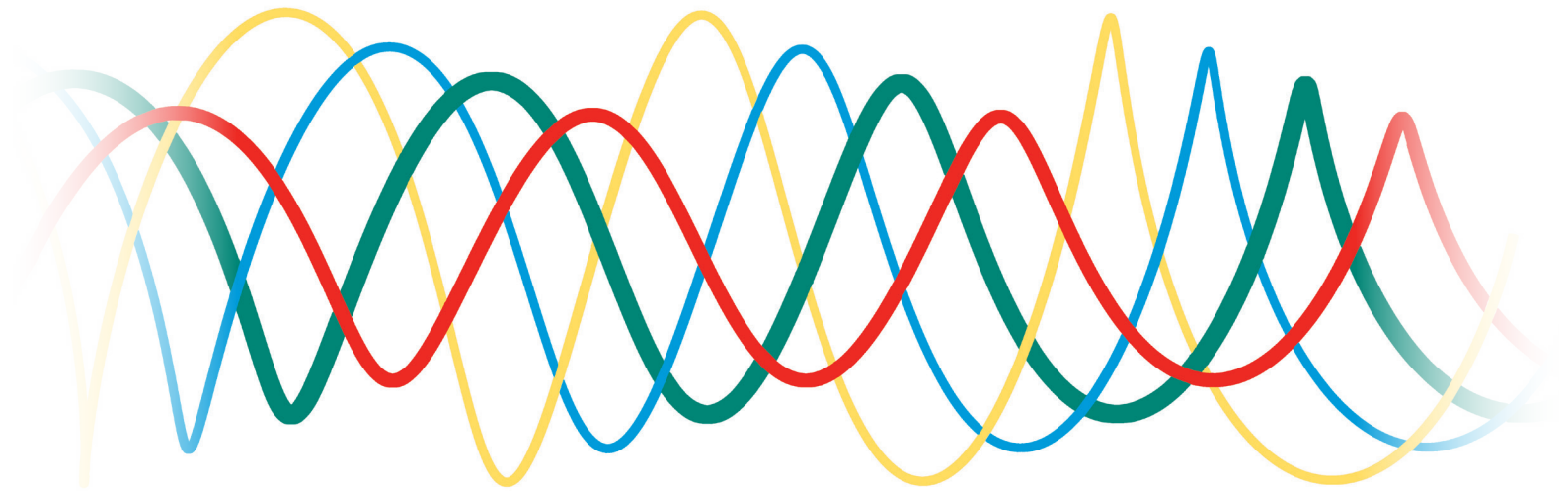


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INDEPENDENT EXAMINATION OF THE CHELMSFORD DRAFT LOCAL PLAN

ID 872955

MATTER 6B

HOUSING PROVISION IN GROWTH AREA 2
NORTH CHELMSFORD



GROSVENOR

**HAMMONDS
ESTATES**

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

- 6b.1. On behalf of Grosvenor Developments Limited ('Grosvenor') and Hammonds Estates LLP ('Hammonds Estates') who are development partner and landowner of Hammonds Farm respectively ('the promoters'), the following information is provided in relation to Matter 6b – Housing Provision in Growth Area 2 – North Chelmsford.

Main issue – Whether the supply of housing development in Growth Area 2 – North Chelmsford (GA2) is sound

Qu.65 *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?***
- b. Is the housing trajectory realistic and are there any sites which might not be delivered in accordance with the timescale set?***
- c. Are the planning and masterplanning principles justified?***
- d. Are the specific development and site infrastructure requirements clearly identified for each site allocation, are they necessary and are they justified by robust evidence? Is any other infrastructure necessary for site delivery?***
- e. Are the site boundaries justified?***
- f. Will the site allocations in these locations achieve sustainable development?***
- g. Are any amendments necessary to ensure soundness?***

- 6b.2. There are fundamental issues with delivery arising from the council's decision to allocate Strategic Growth Site 4 for 3,000 dwellings at North East Chelmsford (NEC), effectively extending an existing allocation in the North Chelmsford Area Action Plan (NCAAP) (Beaulieu and Channels), which is providing 3,200 dwellings in the same location. Beaulieu and the proposed allocation at NEC have been promoted by Countryside Zest, the latter as the sole housebuilder within a consortium of landowners (see paragraphs 3.21 to 3.57 of Hammonds Estate's representation (PS1045)).

- 6b.3. Delivery by the same housebuilder in the same location, as a continuation of an existing urban extension, will result in uniformity of the homes on offer and will limit the rate at which the market will absorb new homes, therefore affecting the pace

of delivery. This is evidenced by the findings of the Letwin Review¹ (see page 6 at 2 of the promoters' Matter 1 Statement).

- 6b.4. The council's housing trajectory² identifies an annual average delivery of 368 dwellings from Beaulieu, Channels and NEC (2018-2036), with the maximum annual delivery for Beaulieu and NEC of 442 dwellings between 2028/29 and 2032/33. Such high annual delivery rates are wholly unrealistic given that the combined average annual delivery at Beaulieu and Channels for the period 2015/16 to 2017/18 was 242.
- 6b.5. As set out in relation to Matter 1 (paragraph 1.36) there is considerable evidence that delivery of around 250 dwellings per annum is a realistic rate on large scale sites. This view was recently supported by the Inspector examining the North Essex Authorities Strategic Section 1 Plan, who concluded that it would be prudent to plan for annual average delivery at 250 dpa.
- 6b.6. Evidence of housing delivery by Countryside on other large-scale sites confirms that delivery rates of the scale envisaged in the PSP have not been achieved, even where there have been multiple housebuilders.

	No of dwellings consented	Average annual delivery based on homes delivered	Average annual delivery based on homes delivered and projected delivery	No. of housebuilders
Beaulieu	3,600	137	213	2 ³
Great Kneighton, Cambridge	2300	260	217	5
Kingsmere, Bicester	1,585	154	158	7

- 6b.7. In the event that only 250 dwellings were delivered per annum at Beaulieu, Channels and NEC, this would result in a shortfall in delivery at these sites of 2,120 dwellings during the plan period based on the council's latest trajectory (SD002 and EB063) (based on 6,620 (Beaulieu, Channels & NEC delivery 2018-2036 minus 4,500 (250dpa x18 years)).
- 6b.8. This evidence demonstrates that the council's housing completion rates for NEC are not deliverable and therefore the PSP is unsound.
- 6b.9. Delivery of NEC is also dependent on the rephasing of existing mineral operations and updating of restoration conditions. A planning application for the former (requiring EIA (see appendix 3 of Matter 1) has not yet been submitted. Whilst the outcome and timescales for altering the phasing and conditions is unknown it is clear from the scoping opinions issued by Essex County Council that these applications will involve a considerable amount of technical work, some of which will be seasonally constrained. There is therefore considerable risk of delay, which

¹ Rt Hon Sir Oliver Letwin, MP (June 2018) Independent Review of Build Out Rates Final Report and Draft Analysis and Annexes

² SD002 and EB069

³ L&Q is delivering the affordable housing element

would have consequential delays to the delivery of development. As a result, the PSP is not effective and is unsound.

- 6b.10. Whilst a Minerals Resource Assessment has been prepared (see SOCG15) the option of extracting mineral from Area D as a satellite operation has not been properly assessed. The option of working the site as a satellite operation to Bulls Lodge Quarry, with processing taking place at the quarry has been dismissed on the basis of untested assumptions regarding economic viability. In the event that extraction is required from this area, both the extraction and the processing at Bulls Lodge would delay the delivery of housing at NEC within the plan period.
- 6b.11. A fundamental element of the proposed allocation at NEC is the delivery of a single carriageway of the NEC Bypass, a key element of Chelmsford's and the wider sub-region's strategic infrastructure. Supporting text (paragraph 7.221) refers to the need to safeguard the preferred corridor route and provide a phased approach to its delivery. Draft policy text does not, however, refer to this. There is a lack of clarity and certainty regarding the delivery of the bypass given that the remainder of the bypass is identified in the PSP and the Infrastructure Delivery Plan (EB018B) as being delivered through the allocated site at Beaulieu and through financial contributions from NEC and other sites north of Chelmsford.
- 6b.12. Reduced delivery from North East Chelmsford, as set out above, together with issues identified in respect of the suitability / delivery of other sites in Growth Area 2 would reduce the level of contributions that could be sought from these sites, impacting on overall funding for the bypass.
- 6b.13. There remains a significant funding gap to deliver the bypass, which is reliant in significant part on an ongoing HIF bid. Provision of the bypass is also affected by other major issues:
- The northern section of the bypass is in multiple third-party land ownerships, one of whom has objected to the proposed route (see appendix 4 of Matter 1 Statement)
 - There is a potential need for minerals extraction and restoration prior to provision of the bypass, which has the potential to result in considerable delay to its delivery
 - The IDP (EB018B) notes that the provision of the bypass on existing minerals land has the potential to have a significant impact on engineering requirements. This will increase costs and affect viability
- 6b.14. Paragraph 3.10 of EB018B states that delivery of early phases of the bypass are critical to delivery of growth in North Chelmsford and in particular at NEC. In the light of the complex issues affecting delivery of this site, delivery of the bypass cannot be guaranteed.
- 6b.15. The delivery of North East Chelmsford relies on the delivery of Beaulieu Station to provide sustainable transport options for residents. The IDP suggests that the station will be delivered by 2025. It is clear from paragraph 3.3, bullet point 6 of the IDP that funding to bring this project and NEC Bypass forward is not yet secured, with a significant funding gap, which is reliant in part of a £250 million HIF bid, which will not be determined until 2019. Funding from Countryside Zest

(Beaulieu Park) LLP towards the construction of the station has been put back through the Fourth Deed of Variation to the Beaulieu Park legal agreement, with the final payment towards construction to be paid no later than 30th April 2025. Furthermore, payments are reliant on further written assurances from Network Rail, the Department for Transport and Chelmsford City Council.

- 6b.16. Even if funding becomes available for the bypass and station, there remain a number of significant issues that could further delay delivery of this key element of infrastructure.
- 6b.17. Whilst the draft policy requires the provision of a new country park, it is noted that this lies outside the allocation boundary. In order to ensure delivery of the country park, this should lie within the allocation.
- 6b.18. This evidence demonstrates that there are extensive and complex issues affecting this site and that the council's housing completion rates are not deliverable with the potential for delay of housing delivery. The PSP is therefore unsound.
- 6b.19. The scale of housing proposed at Great Leighs is not justified and is not deliverable as set out in the PSP.
- 6b.20. As set out in the promoters' Matter 5 Statement, Great Leighs has been incorrectly defined as a key service settlement, with its services more typical of a lower tier service settlement. Accordingly, it is not a suitable or sustainable location for the provision of 1,100 homes (in addition to the consent development of 100 homes).
- 6b.21. Development at Great Leighs does not comply with key spatial principles, particularly those related to locating development at well-connected, sustainable locations (to Chelmsford), ensuring development is deliverable, ensuring development is served by necessary infrastructure and planning for the longer term.
- 6b.22. Development of 750 homes west of the A131 dual carriageway and 450 homes (including 100 homes at EC3) east of the dual carriage will not realise a cohesive, sustainable community, given that the A131 is a major barrier. Strategic Growth Site 5a will be isolated from the main part of the village.
- 6b.23. The proposed allocations would more than double the existing number of dwellings (1,022, Census 2011) whilst providing limited facilities to support existing and new residents. This is not considered to be justified and would be unsustainable.
- 6b.24. Considerable stress would be placed on existing facilities, particularly in the village, but also at Braintree, where many residents will seek to access facilities and services, given its closer proximity than Chelmsford. There will be particular pressure on healthcare (there are no existing local facilities) arising from the allocation of a site for 250 specialist homes for older people with no specific provision planned (EB018B, Table 9.1). Furthermore, the location of all facilities, including healthcare facilities west of the A131 will limit their accessibility, particularly for elderly residents.

- 6b.25. The IDP (EB018B) acknowledges that secondary education provision will be provided through extensions to Notley High School. There is no indication how pupils will access the school (see paragraph 3.77, Hammonds Estates representation (PS1045)).
- 6b.26. The proposed improvement to the A130/A131 corridor and the proposed North East Chelmsford bypass will improve access from Great Leighs towards Chelmsford providing residents of Great Leighs with easy access to the highway network, thus encouraging car as well as public transport use. Without improvements to existing, or new bus services, and most importantly a modal shift in the way that people travel, the scale of development proposed will lead to extensive outcommuting to access facilities, services and employment elsewhere, thereby impacting on the transport network (see paragraphs 3.75 to 3.80 of Hammonds Estates representation (PS1045)). Paragraphs 7.250, 7.262 and 7.276 of the PSP state that the site must provide good accessibility for bus services and provide the necessary bus stop infrastructure but there is no requirement to either provide or facilitate the provision of a bus service through contributions within the PSP.
- 6b.27. Delivery of the Great Leighs sites (Strategic Growth sites 5a, 5b & 5c) is constrained by the need to upgrade provision at Great Leighs Water Recycling Centre. The IDP states that *"it will be difficult for any significant growth to come forward before 2024"* (paragraph 5.15, EB018B). Despite this, the PSP identifies that 350 dwellings will come forward in the period 2019/20 – 2023/24 (SD002). When taken with the need for masterplans to be prepared, planning applications to be submitted and approved (likely to be outline applications followed by reserved matters), conditions discharged and contracts for construction procured the housing trajectory for these sites is unrealistic and casts doubt on the deliverability of housing at Great Leighs, contrary to the requirements of the NPPF.
- 6b.28. In addition, the phasing of development at Great Leighs is inter-dependent with the school at Site 5a required before Site 5c can come forward. Any delays to the provision of the school (or other supporting infrastructure) at Site 5a will impact on the delivery of Site 5c (see paragraph 3.77, Hammonds Estates representation (PS1045)).
- 6b.29. In light of the above, Great Leighs is not a sustainable location for development and hence the PSP is not the most appropriate strategy for locating development in Chelmsford. Development will have a significant adverse impact on Great Leighs and the surrounding area as a consequence of the additional demand on services and the likelihood of significant use of private transport to access a wide range of services and facilities.
- 6b.30. Location 6: North of Broomfield appears to have been allocated on the basis that it provides an opportunity to secure a new access to Broomfield Hospital. Paragraph 7.1 of Topic Paper 1 (TP001) is clear that the selection of strategic development sites has been informed by a range of considerations including *"the ability to maximise the use of existing/proposed infrastructure and to deliver [...] a new link road to Broomfield Hospital"*. Paragraph 3.18 of the EB018B states that *"the development of land north of Broomfield necessitates the provision of an additional access road to serve Broomfield Hospital"*. This cannot be the case.

The allocation merely facilitates its provision. These, does not provide sufficient justification for allocating this site.

- 6b.31. It is noted that it is the site promoter's intention (paragraph 4.4, PS1248) to provide an access and spine road through the site *"facilitating the opportunity for a Secondary Access to Broomfield Hospital ..."*. Bloor Homes expect the remainder of the road to be provided by Broomfield Hospital.
- 6b.32. North of Broomfield is relatively remote from Chelmsford city centre and is not close to local services and facilities nor to employment, with the exception of Broomfield Hospital. The scale of development proposed has been reduced from that originally proposed and whilst it is intended that the development provides a neighbourhood centre this will not, on its own, provide a sustainable development.
- 6b.33. Given the scale of development proposed and limited facilities that are to be provided on site, North of Broomfield will not achieve the PSP's Vision to provide new sustainable neighbourhoods., with residents likely to travel beyond Broomfield (which has only local facilities) to access key services and facilities. The promoter of this site, Bloor Homes, has previously raised concerns regarding the viability of providing a neighbourhood centre (see paragraph 5.9, Bloor Homes Preferred Options Representation, appendix 1) when the site was allocated for 850 homes. It is now allocated for 450 homes, further bringing into question the viability of providing a neighbourhood centre.
- 6b.34. The Housing Trajectory (SD02) identifies that housing at North of Broomfield will be delivered from 2021/22 onwards. Given that the plan is unlikely to be adopted until spring 2019 (if found sound), that masterplans will need to be prepared, consultation undertaken, planning applications submitted and approved (in many cases, outline applications followed by reserved matters), conditions discharged and contracts for construction procured, it is unrealistic to think that this site will start to deliver housing within two to three years.
- 6b.35. The draft policy requires the provision of highways improvements to the local and strategic road network, measures to promote and enhance sustainable modes of transport, and new and enhanced cycle, pedestrian and horserider routes. Limited proposals are identified in the PSP or its supporting evidence, with the consultation document for the North Chelmsford part of the Chelmsford City Growth Package acknowledging that the installation of bus only lanes or a bus only access gate was discounted due to a lack of physical space and the impact of changing traffic movements on the network. The lack of space and heavily congested nature of this road limits the ability to make substantial improvements. already. Thus, the provision of sustainable transport measures to meet PSP policies and the NPPF is compromised.
- 6b.36. There is a lack of information in relation to bus provision and it is unclear how bus services are to be extended or provided to the site. It is noted that in the Statement of Common Ground between the council, Essex County Council and First (paragraph 1.14, SOCG13) there is only a commitment that schemes in excess of 500 dwellings located close to existing routes should be able support diversions or extensions to services.

- 6b.37. Table 3.1 of the IDP update (EB018B) provides a summary of transport needs to support this site, which include funding for the North East Bypass, the road to Broomfield Hospital and road junctions, as well a bridge to facilitate improvements for walking and cycling. Paragraph 13.12 of the IDP update (EB018B) identifies that there is a need for contributions of £31,240 per dwelling at the North of Broomfield site, the highest per dwelling contribution, with the exception of North East Chelmsford, for which there are extensive on and offsite infrastructure requirements. Given the small-scale nature of the allocation the level of these and other contributions identified may affect the viability of the site. It is noted that Bloor Homes reserves its position on these matters, which it states will be subject to viability and necessity testing.
- 6b.38. Table 6.1 of the IDP update (EB018B) identifies a need for 0.32ha of allotment yet there is no requirement within the draft policy for it to be provided.
- 6b.39. Whilst a Mineral Resource Assessment has been produced for North of Broomfield, it is not robust, relying on inadequate geological investigation such that the conclusions cannot be relied upon.
- 6b.40. Given the limited benefits likely to arise from this site and the deficiencies highlighted above the site is not considered to have been justified, is not effective and is not consistent with national policy. In this respect the plan is unsound in this respect.
- 6b.41. In contrast, the proposed development at Hammonds Farm, east of Chelmsford, would be of a scale that would enable the provision of appropriate infrastructure to support the new self-sustaining community, including the delivery of key infrastructure at the outset and in step with development.

Appendix 1 Extract (Paragraph 5.9) of Bloor Homes Preferred Options
Representation

Chelmsford Local Plan Preferred Options Consultation Document: Our Planning Strategy to 2036

Responses on behalf of Bloor Homes Eastern

May 2017

**Chelmsford Local Plan
Preferred Options Consultation Document:
Our Planning Strategy to 2036**

Responses on behalf of Bloor Homes Eastern

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hospice, whilst also helping to alleviate local congestion. Dialogue has taken place with key representatives of the hospital and hospice. Subject to ongoing dialogue, further evaluation and agreement, it is intended to determine a route, specification and mitigation.

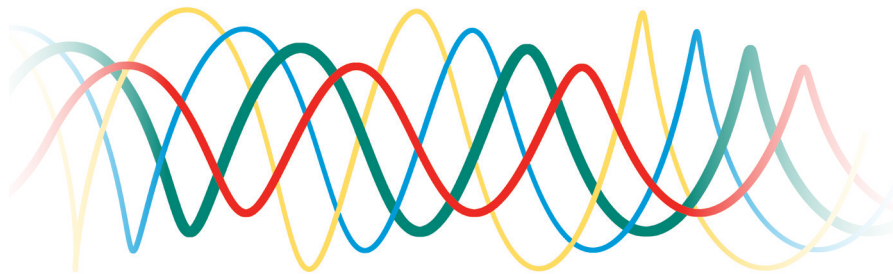
- 5.8 There is also the opportunity to retain and create new footpath links between the development site, Woodhouse Lane and the Hospital site. Such links are consistent with the County Council aspiration to achieve a long distance cycle route from other northern areas to the Hospital site. Such links would require a significantly reduced width to ensure that the new development is not used as a “free” parking area for Hospital visitors and suitable control measures for all cycle routes will be proposed. It is suggested that a degree of flexibility is also added into the policy requirement. This is highlighted within paragraph 154 of the NPPF, which seeks Local Plans to be aspirational but realistic. We suggest the following revision to bullet point number 6:

“We will seek to work with Chelmsford City Council, Broomfield Hospital and other partners to enable the provision of a new access road to serve the development, with access links to Broomfield Hospital and Fairleigh Hospice where deliverable.”

- 5.9 Bullet point 11 refers to the provision of a “Neighbourhood Centre”, which would include shopping, convenience, health and cultural facilities. There are, however, some concerns regarding the viability of such a centre within a development of up to 800 dwellings.
- 5.10 Given the required location of the main access from the B1008 and the degree of openness and new landscaping proposed in this location, there is limited scope for any such facilities to be located directly along the road itself. New retail provision will however require passing trade in order to make the business viable and therefore the retail element of the proposal will need to be carefully considered to ensure it is within an appropriate location within the site.
- 5.11 With regards to other facilities, the Vision Document highlights where these uses could be located. The locations are for the benefit of all future residents of the scheme and occupiers of neighbouring properties. However, its future success relies upon the facilities being viable to attract and retain a user.
- 5.12 It is therefore recommended that further flexibility is allowed for the policy to encourage the provision of facilities on the site unless it is unviable to do so. We therefore suggest

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