EXAMINATION STATEMENT – MATTER 11 Chelmsford Local Plan

Representations on behalf of Redrow Homes (ID: 927695)

November 2018



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REPRESENTATIONS ON BEHALF OF REDROW HOMES (ID: 927695)

NOVEMBER 2018

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1.0 INTRODUCTION

- 1.1 This Statement has been prepared by Barton Willmore LLP on behalf of our Client, Redrow Homes, who has an interest in the land to the east of Great Baddow and west of the A12 that forms the following emerging strategic allocations at proposed Growth Area 1 "Central and Urban Chelmsford" (Location 3) in the draft Local Plan:
 - Strategic Growth Site 3b Land North of Maldon Road (employment site);
 - Strategic Growth Site 3c Land South of Maldon Road (residential site); and,
 - Strategic Growth Site 3d Land North of Maldon Road (residential site).
- 1.2 Representations have been made on behalf of our Client throughout the production of the Local Plan. Our representations to the Regulation 19 Pre-Submission draft Local Plan related to the above proposed allocations as well as additional land to the east of Growth Site 3c and west of the A12 (labelled as 'Site 3e' in our representations). The representations included a Development Vision Document to explain the masterplan and vision for this land to create an attractive and sustainable new neighbourhood.
- 1.3 Notwithstanding the land interests of our Client, these representations have been prepared in recognition of prevailing planning policy and guidance, in particular the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG).
- 1.4 The Local Plan was submitted prior to the revised 2018 NPPF and is therefore being examined under the 2012 NPPF. Reference is therefore made to the 2012 NPPF in responses to the Inspector's questions, unless otherwise stated. These representations respond to the Inspector's questions within Matter 11 and have been considered in the context of the tests of 'Soundness' as set out at Para 182 of the NPPF which requires that a Plan is:
 - **Positively Prepared** the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where reasonable;
 - **Justified** the plan should be the most appropriate strategy, when considered against the reasonable alternative, based on proportionate evidence;
 - **Effective** the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities;
 - **Consistent with National Policy** the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.

2.0 RESPONSE TO MATTER 11 - MONITORING AND VIABILITY

Main issue — Is the Plan viable, deliverable and capable of being effectively monitored?

Question 115

Will the viability of development be adversely affected by the requirements in the Plan including in respect of any required standards, affordable housing provision and transport and infrastructure needs? Has this been suitably tested, particularly for the large strategic growth sites?

- 2.1 A range of site typologies have been viability tested in the Local Plan Viability Study Including CIL Viability Review (January 2018) (ref. EB082A) and in the Post IDP Viability Note (June 2018) (ref. EB082B).
- 2.2 In our response to Matters 6, 8 and 10, we have identified where we consider amendments need to be made to policies to allow for enough flexibility such that the viability and feasibility of delivering the respective required standards, affordable housing provision and transport and infrastructure needs is taken into account.
- 2.3 Redrow's firm ambition to deliver the development envisaged by the allocations at locations 3b, c and d at the earliest opportunity. Redrow is confident that these allocated land parcels within its control are viable and are "justified" and "deliverable" and therefore "sound". As set out in the previous response to Matter 6, there are no major infrastructure requirements to the delivery of these sites and delivery of the entire site can occur from 2020/21.
- As set out in our response to Matter 6, the allocation of additional Redrow land east of 3c (referred to by us as "Site 3e") is also a viable development proposal that would secure comprehensive development to form an appropriate urban extension comprising mixed use development in East Chelmsford.