Andrew Martin
Planning

Examination of the Chelmsford Local Plan Review 2022-2041

Hearing Statement

on behalf of the

Rosehart Properties Ltd and Bressole Ltd

Matter 11 – Monitoring and Review

Response to Questions 11.1, 11.2, 11.3

Andrew Martin MAUD DipTP(Distinction) FRICS FRTPI

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MATTER 11 – MONITORING AND REVIEW

Q 11.1 Are the monitoring indicators adequately linked to the Plan's policy objectives and will they enable the Plan to deliver the intended outcomes?

Q 11.3 Will the Monitoring framework remain effective over the Plan period? Are there mechanisms in place to ensure the monitoring indicators and targets are based on up-to-date documents over the Plan period?

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1. The responses to these two questions are linked in relation to Strategic Policy S6 – Housing and Employment Requirements. Whilst it is accepted that the indicators are adequately linked to the Plan's policy objectives, it is not considered that they are robust enough to enable the Plan to deliver the intended outcomes. The economy is a dynamic process and the economic climate at any point in time has a substantial impact on the housing market and delivery of both market and affordable homes. This is clearly demonstrated at the current time, with actual housing delivery falling woefully short of Government targets, together with Chelmsford City Council's (CCC) expected delivery rates of existing committed sites. There needs to be a more immediate trigger for action if evidence emerges that the Council cannot demonstrate a deliverable 5-year housing land supply. It is considered that regular monitoring of the 5-year housing land supply is a more effective trigger than that published in the Housing Delivery Test, although the latter is still relevant. Evidence of housing land supply is generally and regularly monitored by the housebuilding industry and tested through appeal decisions.

2. CCC submitted for examination the Local Plan under the NPPF 2023 transitional arrangement and it provides for a housing requirement of 84% of the April 2026 local housing need figure of 1,433 calculated using the latest Standard Method. Although the Council was in a position to exercise this arrangement, it nevertheless will result in a shortfall of housing if calculated under the latest Standard Method. Moreover, recent appeal decisions have shown that the NPPF2026 national decision-making Policy S5 states that certain forms of development outside settlements should be approved, unless the benefits of doing so would be substantially outweighed by any adverse effects. S5(1)(j) specifically provides for development that would address an evidenced unmet need (including, but not limited to, development proposals involving the provision of housing where the local planning authority cannot demonstrate a five year supply of deliverable housing sites or scores below 75% in the most recent Housing Delivery Test), and where the development would be physically well-related to an existing settlement and of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure.

3. Whilst it is expected that an appropriate five-year housing land supply should be demonstrated in accordance with national policy at, or shortly after, adoption of the Local Plan Review, it would be prudent, given the above submissions, to include a Local Plan Review policy in the Plan in the event that a five-year housing supply cannot be demonstrated six months from adoption of the Plan.

4. Such a policy was identified as a requirement by the Inspectors who examined the Uttlesford Local Plan 2021 – 2041. The wording of the Uttlesford Core Policy 2a Local Plan Review has been used as a potential template, with appropriate revisions, for the Inspectors' consideration, as follows:

> **Strategic Policy S6a**
> **Local Plan Review**
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> In the event that Chelmsford is unable to demonstrate a five-year supply of housing in accordance with appropriate national policy and guidance six months from adoption of the Local Plan, a Local Plan Review would become necessary.
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> The five-year land supply position, to inform if a Local Plan Review is necessary, will be monitored against the housing requirement identified in **Strategic Policy S6** of 24,915 homes for April 2022 to March 2041.
>
> In such circumstances, the impact on decision making for Development Management purposes would be guided by appropriate national policy and guidance at the time.

5. Furthermore, as submitted in representations to the Regulation 19 Consultations, the Council's statement in Section 6 of the Plan, at paragraph 6.145, that it will commence a formal review of the Plan two years after adoption is entirely unsatisfactory and not effective, especially given fundamental changes in national policy.

Q 11.3 Will the Monitoring framework remain effective over the Plan period? Are there mechanisms in place to ensure the monitoring indicators and targets are based on up-to-date documents over the Plan period?

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6. For reasons set out above, it is not considered that the Monitoring Framework will remain effective over the Plan period, particularly with regard to housing and employment delivery. A new Local

Plan Review policy is suggested as an effective mechanism to rectify shortfalls in meeting housing and employment requirements.

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