



Examination of the Chelmsford Draft Local Plan

Hearing Statement

on behalf of the

North East Chelmsford Garden Village Consortium

Matter 11 – Monitoring and Viability

Response to Question 115

Andrew Martin MAUD DipTP(Distinction) FRICS FRTPI

November 2018 | AM-P Ref: 14010

Examination of Chelmsford Draft Local Plan
Hearing Statement on behalf of the
North East Chelmsford Garden Village Consortium





Matter 11 – Monitoring and viability

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

114. Will Strategic Policy S15 and the proposed monitoring framework set out in Chapter 10 of the Plan be effective to ensure delivery of the policy requirements during the Plan period? Are the timescales for a full or focused review of the Plan justified and consistent with national policy/guidance?
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?
116. Are the proposed key indicators and targets appropriate and measurable? Are any others necessary for monitoring to ensure soundness of the Plan?
117. Does the monitoring framework clearly set out what actions will be taken if targets/policies are not being achieved?

Q114 No Comment

Q115

1. The Consortium's hearing statement in respect of Matter 6b – Housing Provision in Growth Area 2 – North Chelmsford and the associated appendices go into detail on the various infrastructure and policy requirements to deliver the North East Chelmsford Garden Community, as set out in Strategic Policy S11 – Infrastructure Requirements and specifically SGS4 – North East Chelmsford. The key points can be summarised in the following paragraphs.
2. The level and quantum of infrastructure required in the Policy relating to the SGS4 allocation can only be delivered viably through the comprehensive planning of a scheme with sufficient economies of scale. This is recognised in NPPF 2012 paragraph 12: *"The supply of new homes can sometimes be best achieved through planning for larger scale developments, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities."* Such principles are based, inter alia, on comprehensive plan-led development that is of sufficient size to benefit from having the



critical mass to create sustainable mixed-use communities with a wide range of facilities and necessary infrastructure to foster self-containment and reduce the need to travel.

3. The Consortium and its advisers have undertaken detailed analysis and scrutiny of the requirements. A commercial assessment/audit has been undertaken by Turner Morum to appraise the viability and realistic prospect of delivery. The Infrastructure Delivery Plan Report (Turner Morum and others, November 2018) and the Viability & Delivery Analysis Report (Turner Morum, November 2018), together with Section 9 Delivery and Phasing in the draft DFD all demonstrate how the necessary community infrastructure and transport facilities can be delivered incrementally with housing completions in each 5 year period of the Plan. (The above documents are appended to the hearing statement on Matter 6b).
4. In particular the IDP Report concludes that the analysis undertaken suggests that the infrastructure/s106 requirements are reasonable and would not prevent the site from coming forward as anticipated.
5. The Consortium's hearing statement on Matter 8 – Infrastructure also confirms that the infrastructure requirements are viable and deliverable, and within the timescales set out in the evidence relating to SGS4.
6. The hearing statement on Matter 6d – Housing Provision – Affordable Housing in response to Question 66d states that the Consortium do not disagree with the Council's Viability Study and CIL Viability Review that demonstrate that the Council's affordable housing requirement is achievable based on the assumptions taken into account at the time the work was undertaken. This is also confirmed in the Turner Morum Viability & Delivery Analysis in their assessment of the new Garden Community proposals. However, circumstances change over time and depending on the degree of changes, these could be critical to the delivery of the larger Strategic Growth Areas, especially North East Chelmsford that is expected to contribute towards the delivery of the majority of new infrastructure to serve Growth Area 2.
7. The Framework at paragraphs 173 and 177 provides guidance that in pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking to ensure that plans are deliverable. Any affordable housing or local standards requirements that may be



applied to development should be assessed at the plan-making stage, where possible, and kept under review.

8. Therefore, the Consortium considers that Policy H02 should be revised to allow for sufficient flexibility in the circumstances where there may be a lack of viability to deliver policy requirements. The Consortium suggests that additional wording be inserted in Policy H02 to allow for flexibility where because of adverse changes in market conditions, individual site circumstances and unexpected high development costs, it can be demonstrated that the level of affordable housing being sought would make the development unviable. The suggested wording is set out at the end of paragraph 9 of the hearing statement on Matter 6d.
9. In conclusion on this question relating to the viability of meeting the requirements of the Plan, it is considered that the relevant matters have been suitably tested, and particularly in the case for the new Garden Community, SGS4.

Q116 No comments

Q117 No comments