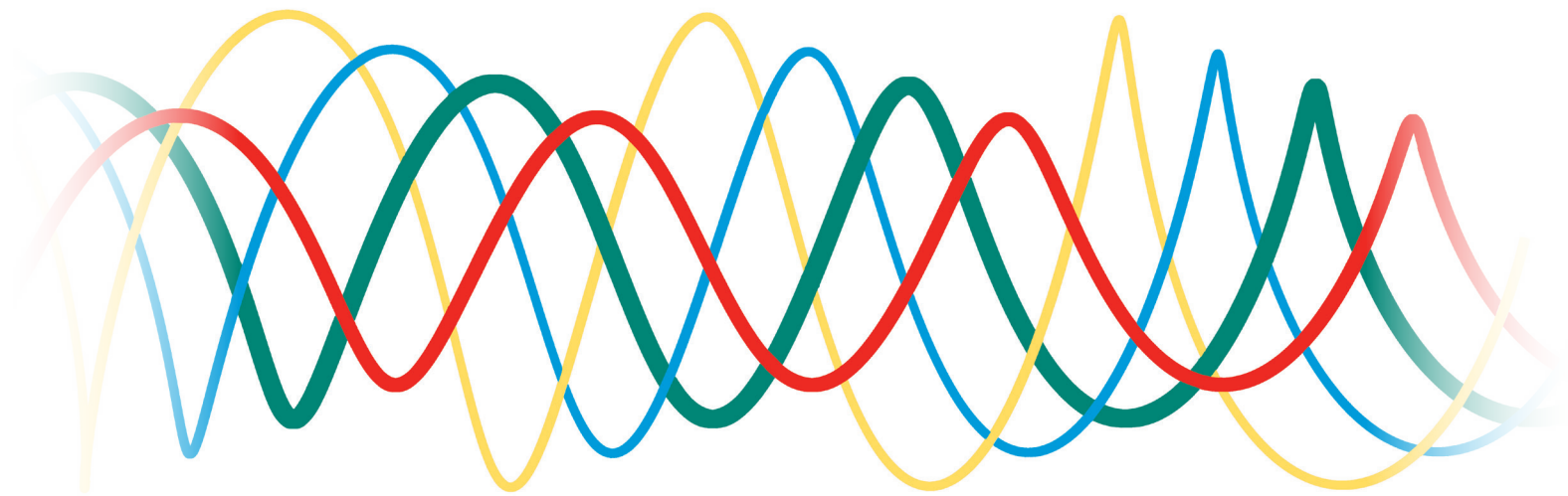


HAMMONDS FARM

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INDEPENDENT EXAMINATION OF THE CHELMSFORD DRAFT LOCAL PLAN

ID 872955

MATTER 6A

HOUSING PROVISION IN GROWTH AREA 1
CENTRAL AND URBAN CHELMSFORD



GROSVENOR

**HAMMONDS
ESTATES**

Matter 6a - Housing Provision in Growth Area 1 – Central and Urban Chelmsford

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 regard to Matter 7 – Employment and Retail Development and relevant issues raised by the Local Plan Inspector to inform the forthcoming Local Plan Examination.

Hammonds Farm is located on the eastern edge of Chelmsford, north of the A414 and east of the A12. The site extends to approximately 568 hectares.

The promoters have been fully engaged with the local plan process so far, and submitted representations to the Regulation 19 consultation in relation to Hammonds Farm and other matters.

The site has the potential to deliver circa 5,000 dwellings (2,600 within the plan period), together with the associated infrastructure and open space required. The vision for this sustainable new village has social value, health and wellbeing at its heart, and would provide public access to extensive new areas of green infrastructure, such as a country park.

Hammonds Farm would provide a distinct offer, in a different location to other strategic allocations, offering a diversity of product to suit a diverse community and a package of other benefits that can only be deliverable on a large-scale site such as this. With a single landowner and an expert master developer, both committed to long-term stewardship and the delivery of social value, Hammonds Farm is uniquely placed to provide a new community that promotes social and physical interaction and enables healthy choices within an attractive setting, a 'community for life' (see Section 4 and appendix 8 Hammonds Estate's representation (PS1045)).

Main issue – Whether the supply of housing development in Growth Area 1 – Central and Urban Chelmsford (GA1) is sound

Qu.62 Are the housing site allocations in GA1 within Location 1: Chelmsford Urban Area, Location 2: West Chelmsford and Location 3: East Chelmsford justified and deliverable? Are there any soundness reasons why they should not be allocated? In particular:

- a. Is the scale of housing for each site allocation, particularly the large 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 for the allocations justified?***
- f. Will the site allocations in these locations achieve sustainable development?***
- g. Are any amendments necessary to the policies to ensure soundness?***

- 6a.1. There is an overreliance on brownfield sites in the Chelmsford Urban Area, which the Pre-submission Plan (PSP) acknowledges can be difficult to bring forward (paragraph 4.6, SD001). Furthermore, a number of the Strategic Growth and Growth sites were previously allocated in the Town Centre Area Action Plan (TCAAP), 2008 (EB119) but have not yet come forward. In many cases, planning applications have not yet been submitted.
- 6a.2. It is noted that a number of sites have been submitted through the SHLAA process, although not all. Furthermore, some sites have been identified by the council through its Housing Capacity in Chelmsford Urban Area study (EB051). This study acknowledges at paragraph 2.1 that “*many sites tested are not being promoted by the owner*”. Evidence to confirm availability of such sites is lacking or has not been taken into account (see Aquila Developments Ltd PS545). In the majority of cases these sites are not in the council’s Developer Phasing Log (EB068).
- 6a.3. Given that ten years have elapsed since adoption of the TCAAP, which covers the period 2001-2021, it is considered that the justification for the continued allocation of those sites that have not yet sought planning permission is doubtful and they should not be re-allocated unless there is clear evidence that the landowner intends to bring their site forward.
- 6a.4. As set out in response to Matter 6 (response to five-year housing supply), a planning application for site allocation SGS1d Former St Peters College, Fox Crescent, Chelmsford is not due to be submitted until April - July 2019. Housing will not therefore be delivered until 2021/22, a year later than identified in SD002. The acceptability of such an application cannot be determined given that Sport England has objected to this allocation in the absence of information regarding the retention or replacement of the existing playing fields.
- 6a.5. There are a number of sites that the council is relying upon in its developable supply that the its evidence does not support. These include not only sites that have been allocated (in whole or in part) in the TCAAP for ten years that have not come forward but also:
 - Sites that have not been promoted through the local plan process and hence their availability is not confirmed
 - Sites for which no contact has been made with landowners by officers to confirm their availability

- Sites with existing uses that may be difficult to relocate e.g. Civic Theatre and council offices
 - Sites originally discounted in the Housing Capacity in Urban Area study (EB051) e.g. GS1k and GS1o due to their “*valuable existing use*”
 - Sites not assessed in either SLAA or Housing Capacity in Urban Areas Study and therefore, their suitability, developability and viability is unknown
- 6a.6. The Infrastructure Delivery Plan (IDP), June 2018 Update (EB018B) continues to identify a need for additional primary school places within the urban area, suggesting that four forms of entry will be needed (120 places per year). It is noted that a viability study to assess the potential for other schools to expand to cater for the need has been commissioned. There are, however, no specific proposals identified in the PSP to provide for this need, and paragraph 8.31 notes that suitable expansion of existing schools would be problematic.
- 6a.7. The IDP Update identifies similar issues with secondary provision, with a requirement for additional five form entry to support planned growth but no specific proposals to deal with this (paragraph 8.45).
- 6a.8. Neither the city council nor Essex County Council as education authority has identified suitable, deliverable education provision to cater for the increase in school age population arising from housing proposed in the urban area. This is despite its provision being identified as “*critical to the sustainability of the developments proposed*” (paragraph 8.54, EB018B). This is contrary to both policies S11 and S12 of the PSP, but also to the requirement of the NPPF to plan positively for infrastructure requirements.
- 6a.9. There is a lack of evidence to justify many of the sites to be allocated in the urban area and to support the council’s housing trajectory for these sites (SD002). Evidence to support their suitability, deliverability and developability and viability is in absent or does not support their allocation. In addition, the lack of identification of required education provision means that required infrastructure will not be made available. Sites that are not justified should be removed from the PSP. In light of this, the PSP is unsound.
- 6a.10. The PSP must include provision for additional housing in order to ensure that the housing requirement is met and the PSP is deliverable, as required by the NPPF.
- 6a.11. The West Chelmsford (Strategic Growth Site 2) allocation is not sustainable due to the relatively small scale of development proposed, with only limited facilities to be provided, in an area that already has only limited existing facilities. This lack of facilities and services will result in significant levels of additional traffic in the locality and beyond.
- 6a.12. 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. However, very limited concrete proposals are identified in the PSP’s supporting evidence. The IDP update is clear that further improvements to bus priority into the city centre are required but these have not been identified. The constrained nature of the A1060 corridor means that such measures (and improvements to

other sustainable modes) are likely to be limited at best and thus the provision of sustainable transport measures to meet PSP policies and the NPPF is compromised.

- 6a.13. The Provision of Bus Services SOCG (paragraph 1.14, SOCG13) confirms that schemes in excess of 500 dwellings located close to existing routes should be able to support diversions and extensions to services. This is qualified, however, with reference to services not being affected by *“excessive and/or variable time penalties which can result in delays to the service alienate existing passengers”*. Given the constrained nature of the A1060 such impacts are likely.
- 6a.14. Whilst a primary school will be provided at the site, the absence of specific proposals to provide for secondary education requirements fails to accord with both policies S11 and S12 of the PSP and the requirement of the NPPF to plan positively for infrastructure requirements.
- 6a.15. Crest Strategic Projects Ltd’s submission to the Preferred Options consultation (paragraph 2.41, appendix 5 of the promoters’ Matter 1 Statement) is clear that if the council’s housing mix and open space requirements are to be met *“the capacity falls to around 580 homes”*. It also states that *“it is doubtful whether the reduced capacity to 580 homes would be sufficient to justify a new primary school and the level of facilities proposed in the Crest scheme to support a sustainable new community”*. This has further implications for the delivery of site infrastructure requirements and the ability of the development to make appropriate financial contributions towards the delivery of required improvements to local facilities. Furthermore, there are significant doubts regarding the ability of the promoter to deliver sustainable transport measures and provide improvements to the highway network as set out above.
- 6a.16. The revised masterplan (appendix 4 of Matter 1) submitted by the site promoter in response to the PSP appears to seek to demonstrate how the site can accommodate the level of development identified in the PSP. However, it is clear that this results in very limited areas of open space on site with extensive areas of green infrastructure, including school playing fields and open space, as well as the required travelling showpeople site being located beyond the allocation boundary. This clearly suggests that the policy is not deliverable, both in terms of the number of dwellings proposed and the infrastructure required, and thus the PSP is not effective.
- 6a.17. Whilst a further updated masterplan is appended to the West Chelmsford SoCG (SOCG14), it fails to address in its entirety the key areas identified in paragraph 6a.16, with key policy requirements located beyond the site allocation.
- 6a.18. Paragraph 7.121 of the PSP states that land to the west is allocated for future recreation use/SuDS, identifying that the layout must respond to topographical, heritage, ecological and landscape features and a nearby Wildlife Site. It does not suggest that this land can be used to provide for the site allocation requirements of the West Chelmsford site.
- 6a.19. As noted above, the site promoter is suggesting that development extends beyond the proposed allocation boundary in order to ensure that the requirements of the draft policy can be met. Clearly this would not be compliant with either the

draft policy or the requirement of paragraph 7.121. At Issues and Options (EB115) stage a larger site at West Chelmsford was consulted upon to provide a substantially larger development. This was rejected by the council in large part as the original proposal had attracted significant public opposition.

- 6a.20. The Housing Trajectory (SD02) (and SOCG14) identifies that West Chelmsford will deliver housing from 2021/22 onwards. Given that the PSP is unlikely to be adopted until spring 2019, that masterplans will need to be prepared, consultation undertaken, that planning applications will then need to be 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.
- 6a.21. In light of the above, the West Chelmsford allocation will not achieve sustainable development. It will result in a relatively large development, located in a poorly connected location that has limited services and facilities in close proximity and will itself only provide limited facilities. The impacts of the development, particularly in relation to the full range of sustainable transport options, will not be able to be mitigated and thus the draft policy fails to accord with strategic policies in the PSP. Accordingly, the policy is not positively prepared, is not justified, is ineffective and contrary to the NPPF.
- 6a.22. In contrast development proposals for Hammonds Farm would comply with the strategic policies of the PSP as set out in the Pre-submission representation (paragraphs 4.28, PS1045). Due to its size it is able to deliver all of the infrastructure required to support the creation of a new self-sustaining community and to mitigate its limited impacts.
- 6a.23. Sites at Location 3: East Chelmsford have the potential to provide sustainability benefits, given their location on the eastern strategic corridor (A414), close to the A12. However, the scale of this benefit is limited due to the relatively small-scale nature of the housing and employment allocations proposed.
- 6a.24. Notwithstanding this, there is the potential to increase the sustainability of these sites, if land at Hammonds Farm were to be allocated for development. This would provide a continuation of development along the strategic corridor, focused around junction 18 of the A12. Given the scale of Hammonds Farm (2,600 dwellings within the plan period), its proximity to Location 3, and existing and proposed access by a range of modes of transport between the two sites, it has the potential to provide access to a wide range of services and facilities that would be of significant benefit to East Chelmsford and other existing communities.
- 6a.25. Proposals for Hammonds Farm include a substantial employment element (3.1ha), which when taken with the 5,000sqm of employment space at East Chelmsford would provide an alternative employment location that would balance the substantial area of employment allocated at Beaulieu Park and at North East Chelmsford (see Matter 7 Statement).
- 6a.26. All four sites at East Chelmsford are collectively required to make improvements to the local and strategic highway network and to promote and sustain sustainable travel, including new and enhanced cycle routes, footpaths, public rights of way and bridleways (where necessary). Whilst the PSP would benefit from further detail

on what is likely to be required, this will improve both the Maldon Road corridor and provide non-car modes of transport to the city centre and to adjacent communities. Hammonds Farm, which is immediately adjacent to the East Chelmsford sites, is well-located to make use of, and where appropriate, contribute to these improvements.

Qu.63 *Policy GR1 allocates Growth Sites within the Chelmsford Urban Area. Growth Sites 1i-1v list objectives/criteria.*

- a. Are the Growth Sites policies? Do they clearly set out what development will or will not be acceptable within the site and would this be clear to a decision-maker? Is reference to safeguarded land and phasing justified?***
- b. Is the potential for student accommodation on Growth Site 1k justified and would this be in addition to or instead of the ‘around 75 new homes’?***

6a.27. The Growth Sites text does not constitute policy text in its current form. At present, site text must be read in conjunction with Policy GR1. This is inappropriate and unclear to decision-makers.

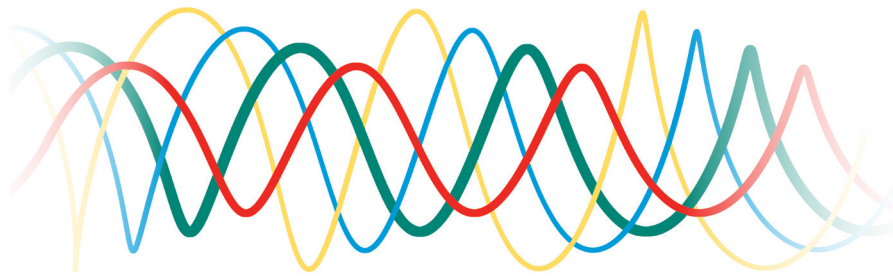
6a.28. Reference to safeguarded land at paragraph 7.33 for the provision of a new primary school is not justified. The Growth Sites are affected by the absence of identified suitable, deliverable education provision, despite its provision being identified as “critical to the sustainability of the developments proposed” (8.54, EB018B). This renders the PSP unsound.

Qu.64 *What is the purpose of the Opportunity Sites OS1a and OS1b? Why are they called opportunity sites? Do they set out site specific objectives or are they policy requirements? Do they clearly set out what development will or will not be acceptable within the site? Is reference to safeguarded land and phasing justified?*

No comment

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