



**EXAMINATION IN TO THE DRAFT CHELMSFORD LOCAL
PLAN**

**EXAMINATION HEARING STATEMENT – MATTER 6c:
HOUSING PROVISION IN GROWTH AREA 3**

Prepared by Strutt & Parker on behalf of Hill

November 2018

Chelmsford Draft Local Plan

Matter 6c: Development Strategy

Introduction

1. Strutt & Parker is submitting this Hearing Statement to the Examination into the Chelmsford Local Plan on behalf of Hill. Previous submissions have been made to Chelmsford City Council at the Regulation 18 and Regulation 19 stages of the Local Plan process on behalf of our client.
2. This Hearing Statement addresses issues raised by the Inspector in Matter 6c and specifically relates to the section and questions relating to Danbury in Questions 73 and 74.
3. Chelmsford City Council's approach to accommodate 100 dwellings to Danbury is broadly supported but there is concern that the Local Plan is not 'effective' in dealing with circumstances that may arise in the event that the production of the Danbury Neighbourhood Plan is delayed or aborted.

Q73: Are the housing site allocations in location 9: Danbury justified and deliverable and are they consistent with the Plan's spatial principles (Strategic Policy S1) and national policy?

4. The proposed allocation of 100 new dwellings at Danbury (location 9) is consistent overall approach set out in Spatial Policy S1 and national planning policy.
5. Danbury is a large sustainable settlement (the third largest in the local authority after Chelmsford and South Woodham Ferrers with a population circa 6,500) with an excellent range of shops, services, and facilities. There is a demonstrable need for housing in Danbury, especially affordable housing and it is therefore important to ensure that in allocating sites, provision should be made of a sufficient size to ensure affordable housing needs are met. Danbury is a much sought-after location with property prices higher than those in Chelmsford and additional housing and affordable housing is required. Consequently, we accept the overall city-wide housing figures but in the event that the overall housing requirement is increased, we would expect Danbury to be reassessed as part of any redistribution.
6. The NPPF 2018 exempts housing developments in England of 9 homes or fewer from affordable housing and S106 financial contributions. It is therefore vital that some

larger sites such as the land at Mill Lane, Danbury, being promoted by Hill are allocated through the neighbourhood plan process if the much needed affordable housing is to be provided. If the neighbourhood plan process only allocates small sites, it is highly unlikely that the needed affordable housing required will be delivered.

Q74: Strategic Growth Site 9 allocates 100 new homes at Danbury. Reference is also made to ‘around 100 new homes’ – which term should it be? Is it appropriate to call this a ‘site’ or ‘allocation’ when no site or sites are identified within the Plan? At what stage is the Danbury Neighbourhood Plan and does the Plan provide a mechanism to ensure delivery of housing should there be a delay in its production

7. Strategic Location 9 in the Chelmsford Draft Local Plan proposes ‘*an allocation of 100 new homes to be accommodated within or adjoining the Key Service Settlement of Danbury*’. This approach is supported but it should be considered a minimum target and reference to it being ‘*around 100 new homes*’ should be avoided to aid clarity.
8. It is not appropriate to call this a ‘*site*’ and it should be referred to as an ‘*allocation*’ since responsibility for site identification will be determined through the neighbourhood plan process rather than the local plan. This allocation or requirement may ultimately be spread across two or more sites and consequently it is therefore inappropriate to call this a ‘*site*’.
9. The Danbury Neighbourhood Plan is overseen and coordinated by a steering group and was created by local residents, community groups, and local businesses with the aim of helping to shape how the parish changes over the coming years. The Danbury Neighbourhood Plan Steering Group has played a proactive role working with the local community to gauge local opinions about how and where the parish should grow – the focus being on meeting local needs.
10. It is understood that approximately 900 questionnaires have been returned and are currently being analysed, which will be followed by an exhibition. It is therefore clear that there is considerable interest in the preparation of the neighbourhood plan and a high level of engagement in it by local people.
11. Hill has been very supportive of the neighbourhood plan approach and has actively engaged in this process. It should, however, be acknowledged that the Danbury Neighbourhood Plan is at an early stage in its preparation and therefore carries little weight in the determination of planning applications, and there is currently no

mechanism within the Local Plan to ensure the delivery of housing in the event that the Danbury Neighbourhood Plan is delayed or aborted.

12. Given that the preparation of neighbourhood plans is not a statutory requirement set out in planning legislation but rather a tool through which local communities can shape the places they live and work, there should be a mechanism through which to ensure delivery is maintained if the plan is delayed.
13. Hill supports the Council's approach to delegate decisions relating to the allocation of sites to the local community, given that Danbury Parish Council and the community that it represents has expressed a desire and commitment to preparing a neighbourhood plan. Hill is strongly committed to working constructively with the neighbourhood plan group and the local community to help deliver a high-quality scheme that meets the needs of the local community.
14. Hill and its representatives have fully engaged with Danbury Parish Council, Danbury Neighbourhood Plan Steering Group, and the local community. However, it should be acknowledged that the Danbury Neighbourhood Plan is at a very early stage in its preparation. In order to ensure that the Chelmsford Local Plan is sound, it is essential that there is a specific and identified mechanism through which to review the situation should for whatever reason, the neighbourhood plan be delayed or abandoned altogether.
15. A failure to include such a mechanism within the Chelmsford Local Plan introduces a significant risk to the delivery of housing, and while 100 dwellings is a relatively small figure as a proportion of the overall city-wide figure, it is of considerable importance locally to Danbury to enable the Key Service Settlement to grow sustainably – this is of particular importance given that the overall number of 100 dwellings has already been reduced to take account of local constraints – any further reduction or elimination of the figure for Danbury raises significant concerns relating to the delivery of appropriate affordable and market housing. If further housing is not provided at Danbury, affordable housing needs will not be met and property prices will be further pushed up as demand-side pressures will not be met. That will worsen the issue of affordability and push more people into need of subsidised affordable housing.
16. It is therefore recommended that the following text be included in Strategic Policy 9 of the Draft Chelmsford Local Plan after '*...Strategic Policies can be allocated through relevant Neighbourhood Plans*': with '*In the event that a neighbourhood plan for a particular area is not made within 18 months of the adoption of the Local Plan, planning*

applications for proposals consistent with the Local Plan will be considered against the relevant housing target for that particular settlement/growth location'.

17. In recognition of the Council's need to deliver both market and affordable housing, delays in the progression of the neighbourhood plan should not inhibit sites being brought forward within 18 months of the Local Plan being adopted. The policy should also provide guidance on the how affordable housing will be delivered, and we suggested that includes either requiring the provision of at least one substantially sized site or that a substantial amount (circa 90%) should be provided on sites of 10 or more to ensure significant affordable housing provision given the acute need in the area. This will help to ensure that the housing needs set out in the Chelmsford Local Plan are deliverable and achievable.