



Chelmsford Local Plan

Examination in Public

Hearing Statement

on behalf of

Croudace Homes

Week 3

Matter 11 – Monitoring and Viability

November 2018

AM-P Ref: 15024



INTRODUCTION

1. This Hearing Statement has been prepared by Andrew Martin – Planning (AM-P) on behalf of Croudace Homes.
2. Croudace controls a total of 77.7 hectares (ha) of land to the north, east and south of Rettendon Place. Just under half of this land (approximately 38.3 ha), to the north and east of the settlement, is designated as “countryside” (rather than Green Belt) and is considered to have potential for development in the foreseeable future.
3. Despite featuring in two of Chelmsford City Council’s (CCC’s) three spatial options at the Local Plan Issues & Options (EB115) stage in 2015, the site was not included as a preferred growth location when CCC published its Local Plan Preferred Options (EB116) in 2017 or its Local Plan Pre-Submission document (SD001) in 2018.
4. This Hearing Statement supplements Croudace’s formal representations from March 2018 and considers the Inspector’s Issues and Questions in relation to Week 3 Matter 11 of the Examination.

MATTER 11 – MONITORING AND VIABILITY

(Q.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?

5. Strategic Policy S15 in SD001 proposes to commence a full or focussed review of the Plan three years after its adoption. Supporting paragraph 6.89 explains that this is on the basis that it takes around two years to formally complete this process. Therefore if the Plan is adopted in 2019, CCC intends to commence a review in 2022 and completing this process in 2024 – i.e. five years after adoption.
6. Croudace welcomes the commitment in the Plan to a formal review, but objects to the proposed timescales on the basis that they are unrealistic and undeliverable. In their current form, Strategic Policy S15 and supporting paragraph 6.89 are not “effective” or “consistent with national policy”.
7. Although CCC has a good recent record of development plan production, it is wholly unrealistic to expect any local planning authority to be able to complete a full local plan review in just two years. For example, CCC took approximately four years to prepare, examine and adopt its Core Strategy (from circa 2004 to 2008) and looks set to take another four years to prepare, examine and adopt its new Local Plan (from circa 2015 to 2019).
8. With this in mind, CCC should allow a period of four years (not two) to undertake its next local plan review and therefore commence the review one year (not three) after adoption of the new Local Plan. This is necessary to ensure that the Plan complies with Regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), which legally requires local planning authorities to complete a review of their local plan every five years from the date of adoption.



9. CCC may argue that the requirement to complete a review within five years only involves a decision on whether or not the Plan's policies need updating and if so the production of an updated version of the Local Development Scheme (LDS) – not the formal review and adoption of a whole new local plan.
10. However, reference 61-043 in the Government's Planning Practice Guidance (PPG) confirms that there will be occasions where significant changes in circumstances warrant a review of the relevant strategic policies earlier than the statutory minimum of 5 years. Examples are given in the PPG and include where "... a plan has been adopted prior to the standard method being implemented, on the basis of a number that is significantly below the number generated using the standard method [for calculating housing need]..." This circumstance applies to CCC's Plan, which has been based on the old method for calculating objectively assessed housing need (OAHN) and is likely to be superseded by higher figures when the standard method kicks in fully.
11. If the 2014-based household projections are used, CCC's "housing need" through the standard method is 976 dwellings per annum from 2018 to 2028 ^A. This is significantly (i.e. 21%) higher than the 805 dwellings per annum from the local authority's existing OAHN.
12. It is noted that the ONS published updated 2016-based household projections in September 2018, which if used, would result in a lower "housing need" figure of 812 dwellings per annum from 2018 to 2028 ^B.
13. However, the Government has acknowledged that the 2016-based projections result in the national minimum housing need falling significantly from 269,000 to 213,000 homes per annum. This is far below the Government's overall target of 300,000 homes per annum nationally. In response, the Government's "*Technical consultation on updates to national planning policy and guidance*" (October 2018) proposes that: (i) the 2014-based data should provide the baseline for assessing housing need in the short term; and, (ii) the formula for assessing housing need should be reviewed by the time the next projections are issued. Given that the Government's overall target of 300,000 homes per annum is higher than the national minimum housing need (269,000 homes per annum) arising from even the 2014-based projections, it is reasonable to conclude that the Government's proposed changes are likely to result in CCC's housing need increasing beyond 976 dwellings per annum from 2018 to 2028 – perhaps by an additional 10% or more ^C.
14. In summary, CCC's annual "housing need" is likely to rise significantly from the current OAHN figure and beyond the annual housing provision set out in Strategic Policy S8 of the Plan (i.e. 952 dwellings per annum ^D), once the revised formula and / or updated household projections are available. In accordance with reference 61-043 in the PPG, this justifies a full review of the Plan earlier than the statutory minimum of 5 years and earlier than CCC propose in Strategic Policy S15.

^A The 2014-based projections forecast an increase of 6,677 households (i.e. 81,249 – 74,572) in Chelmsford from 2018 to 2028, i.e. 668 households per annum. An adjustment factor of 0.46125 is calculated based on a local affordability ratio of 11.38 and the following formula $((11.38 - 4) / 4) * 0.25$. This results in a housing need of $((1 + 0.46125) * 668) = 976$ dwellings per annum.

^B The 2016-based projections forecast an increase of 5,555 households (i.e. 78,637 – 73,082) in Chelmsford from 2018 to 2028, i.e. 556 households per annum. An adjustment factor of 0.46125 is calculated based on a local affordability ratio of 11.38 and the following formula $((11.38 - 4) / 4) * 0.25$. This results in a housing need of $((1 + 0.46125) * 668) = 812$ dwellings per annum.

^C The difference between 269,000 and 300,000 being 11.5%.

^D Based on a total housing provision of 21,893 dwellings, divided by the 23-year plan period.



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15. Croudace submits that in order to be “effective” and “consistent with national policy”, Strategic Policy S15 should be amended to read:

*“The Council will monitor the implementation of the policies and proposals of the Local Plan using the key indicators and targets set out in the Plan’s Monitoring Framework. A full or focussed formal review of the Local Plan will commence **one year** after its adoption.”*

16. Consequential amendments should be made to paragraphs 6.89 and 6.90 as a result of the information above.

SUMMARY

17. Croudace is promoting a sustainable new development on 38.3 ha of land to the north and east of Rettendon Place. Although this featured in two of the three spatial options in the Local Plan Issues & Options document (EB115), the site is not included in the current Local Plan Pre-Submission document (SD001).
18. Croudace raised concerns in their March 2018 representations, concerns which have been expanded on in this Hearing Statement. These relate to CCC’s proposed approach to commence a full or focussed review of the Plan three years after its adoption, with a view to completing that review two years thereafter. In recent times it has taken CCC approximately four years to prepare, examine and adopt a new development plan. This, along with the significant increase in housing need brought about by the new standard methodology (and forthcoming revised formula and / or updated household projections), justifies commencing a full review of the Plan much sooner – i.e. one year (not three) after adoption.
19. Amendments are proposed to Strategic Policy S15 to ensure that the Plan is “effective” and “consistent with national policy”, as set out in paragraph 182 of the NPPF.

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