

Chelmsford Local Plan

Examination Hearing Statement

Matter 6 – Housing Provision

Prepared by Strutt & Parker on behalf of Hopkins Homes (ID 927684)

November 2018

Context

1. Strutt & Parker have made representations on behalf of Hopkins Homes throughout the preparation of the Chelmsford Local Plan, in respect of land to the north of Maldon Road (A1114), Great Baddow (also referred to as Land East of Chelmsford/North of Great Baddow in the Council's plan-making process). This included representations on the Chelmsford Pre-Submission (Regulation 19) Local Plan.
2. The Local Plan proposes that the above site be allocated for the development of *inter alia* 250 new homes, new Country Park, and vehicular access to Sandford Mill as Strategic Growth Site 3a.
3. This Hearing Statement is made in respect of the Chelmsford Local Plan Examination Matter 6
4. This Hearing Statement addresses Questions 57 and 61 of Matter 6.

Question 57

Appendix C of the Plan sets out the development trajectories which indicate that deliverability of sites for housing is based on developers' projected build out rates and information from site promoters for years 2017/18 to 2021/22.

a. Are these rates achievable?

5. Large, strategic sites can give rise to complex planning issues; can require the coordination of multiple agencies to ensure infrastructure delivery; and often involve multiple landowners, giving rise to potential issues in respect of land assembly. Such sites can take a significant time to deliver.

6. However, it should be noted that whilst sites categorised as 'Strategic' Growth Sites in the Local Plan include those proposed to deliver 3,000 dwellings, they also include any sites delivering over 100 dwellings. As such, a considerable range of sites fall within this category. Those at the lower end of this range in terms of housing numbers are far less likely to be subject to the complex issues which result in significant lead-in times between allocation for development and its delivery. We note that the Strategic Growth Sites projected to be deliver housing completions within the early years of the plan period are such smaller sites. Whilst we note a tendency for some authorities to make what we consider to be unrealistic assumptions in their proposed Local Plans as to how early large (1,000 plus dwellings) strategic growth sites can be delivered, we do not consider such concerns apply in the case of the Chelmsford Local Plan.
7. The housing trajectory within Appendix C of the Pre-Submission (Regulation 19) Local Plan projected that land at East Chelmsford – Manor Farm (Strategic Growth Site 3a) will deliver 45 dwellings in 2020/21; followed by 50 dwellings per annum between 2021 and 2024; and 55 dwellings in 2024/25.
8. We consider completions from 2020/21 and the delivery rates that were shown in Appendix C of this version of the plan to be very much achievable for Site 3a.
9. Hopkins Homes has control over the land required to deliver Strategic Growth Location 3a. There are no legal or ownership obstacles to the site's development, as set out in our previous representations.
10. A considerable amount of technical work has been undertaken in relation to the proposed development of the site. This has not only helped demonstrate that the site is suitable for development for the purposes of plan-making process, but also means that Hopkins Homes are well-placed to progress the site from the plan-making stage to the planning application stage.
11. Pre-application discussions have been held with key stakeholders, including Chelmsford City Council, Essex County Council and the Environment Agency.

12. We intend to enter into a Planning Performance Agreement with Chelmsford City Council in respect of the Council's Masterplan Procedure and subsequent planning application to ensure these are progressed in a timely manner.
13. We currently envisage submission of a masterplan for the development of Site 3a for the Council's approval before the end of 2018, to be followed immediately on approval of the masterplan by submission of a planning application.
14. The first planning application following approval of a masterplan is planned to be a hybrid application, through which the site in entirety is addressed in outline, but with an element of it in full to enable timely commencement of development.
15. The greatest annual number of dwelling completions the trajectory projects for Site 3a is 55 (in 2024/25). Hopkins Homes are currently delivering more than 55 dwellings per annum on a number of sites across the sub-region, and propose to deliver 55-65 dwellings per annum on Site 3a, upon the grant of planning permission.

b. How has deliverability of sites beyond 2021/22 been assessed and are they realistic?

16. We have no comment to make on the above, other than to confirm that the delivery rates for Site 3a for the period beyond 2021/22 set in Appendix C of the Pre-Submission (Regulation 19) Local Plan are realistic.

c. Does the trajectory reflect the time needed for allocated sites, particularly the large strategic growth sites, to produce a masterplan (where required), gain planning permission, agree any necessary planning obligations and provide for any facilities?

17. In respect of Site 3a, we consider the trajectory allows sufficient time to produce a masterplan, obtain planning permission (including agreeing all necessary planning obligations), discharge any pre-commencement planning conditions and commence development.

18. There has been positive engagement between Hopkins Homes, the Council and other stakeholders through the plan-making process. In addition, Hopkins Homes has prepared a considerable amount of detailed assessment work to support the proposed allocation, which will also be of use to support a planning application. As such, preparation of a planning application to follow - and enable delivery of this aspect of – the Local Plan will not be from a ‘standing start’ after its adoption, but instead is being prepared in tandem with the preparation of the Local Plan. The approach taken by the Council – seeking to engage positively with prospective developers through the plan-making process – assists in this respect, and allows for earlier delivery than may have otherwise been the case.
19. Notwithstanding the above, it must nevertheless be recognised that the requirement to produce a masterplan – and the introduction of an additional tier within the decision-making process – does give rise to an additional element of risk in respect of delivery rates for Strategic Growth Sites, particularly in the event that masterplans are not approved.

Question 61

Is there sufficient flexibility in the housing trajectory to ensure that housing land supply within the Plan area will be maintained and will deliver the housing requirement of Strategic Policy S8?

20. The NPPF (2012) requires Local Plans to not only meet objectively assessed needs, but with sufficient flexibility to respond to rapid change.
21. Possible changes in circumstances of particular relevance include sites unexpectedly failing to come forward / delivery being delayed; and / or level of housing need increasing during the plan period.
22. As such, and in order to ensure sufficient flexibility to enable the Local Plan to be effective, consistent with national policy, and positively prepared, it should not unduly restrict the number of dwellings to be delivered on sites it has identified as being sustainable and deliverable.

23. In respect of Site 3a, and as per our representations made on the Chelmsford Pre-Submission (Regulation 19) Local Plan, we have made it clear that a greater quantum of development can be sustainably delivered through a landscape-led development of the site than the Local Plan currently proposes. Further evidence on the site's suitability to accommodate a greater quantum of dwellings has been prepared since our representation on the Regulation 19 iteration of the Local Plan has been, and we expand upon this issue within our response to Matter 6a.
24. We therefore seek a modification to Policy Strategic Growth Site 3a to make clear to a decision-maker that 350 dwellings can be accommodated on this site (and thereby enabling the delivery of this quantum of new homes), which will assist the City Council in ensuring the Local Plan is sufficiently flexible in its approach to meeting housing needs.