

# CHELMSFORD CITY COUNCIL LOCAL PLAN REVIEW – ISSUES AND OPTIONS CONSULTATION

October 2022



## 1. Introduction

- 1.1 These representations have been prepared in response to Chelmsford City Council's (CCC) Issues and Options consultation regarding the Local Plan Review 2022. CCC has commenced its review of its local plan further to its adoption in May 2020, and ahead of the statutory review date in May 2025.
- 1.2 CODE's representations are accompanied by the submission of a site at Furze Hill, Margarettown for consideration through the Call for Sites. It is considered the site has potential to accommodate specialist accommodation for elderly people, in response to identified needs for this type of accommodation in the district.
- 1.3 For ease of reference, these representations have been prepared in response to specific questions contained within the Issues and Options consultation document in relation to initial issues which CODE consider to be of significant importance in the preparation of the new local plan.

## 2. Meeting the needs for new homes

*Q28. Do you support the approach being taken? If you disagree, please explain why? (*

- 2.1 Paragraph 5.50 of the Issues and Options document states *"The Local Plan must have regard to the minimum number of homes needed using the standard method set in national planning guidance. In addition to local housing need, any needs that cannot be met within the neighbouring areas should also be considered in establishing the amount of housing to be planned for. Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policy."*
- 2.2 In addition, CCC has confirmed that, *"To maintain flexibility in the supply of sites throughout the plan period, it is proposed to retain a 20% supply buffer. Adopting this approach and considering existing supply across the period 2022-2041, there is a shortfall of 7,966 homes in total"*.
- 2.3 CODE is supportive of CCC's approach to retaining a 20% supply buffer. This is consistent with the government's objective of significantly boosting the supply of homes, by ensuring that a sufficient amount and variety of land can come forward where it is needed, as outlined in paragraph 60 of the National Planning Policy Framework (NPPF). In addition, paragraph 60 emphasises the requirement to meet the needs of groups with specific housing requirements. This includes the provision of specialist accommodation for elderly people.
- 2.4 It is noted that the key outputs of the revised housing and land supply evidence base documents will include the determination of the *"size, type and tenure of housing needed for different groups in the community including, but not limited to, those who require affordable housing"* and *"older people"*. In addition, these evidence base documents will identify *"a sufficient amount and variety of land that can come forward where it is needed to meet the needs of groups with specific housing requirements."*



- 2.5 CODE is supportive of CCC's approach to identifying the needs of different groups in the community, including elderly people, and the intention to ensure that a sufficient amount and variety of land can come forward where needed to meet identified needs. The Planning Practice Guidance (PPG) adds additional weight to the need to appropriately identify and plan for the housing needs for elderly people. Indeed, the PPG states *"Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision taking."*<sup>1</sup>
- 2.6 Furthermore, the PPG is clear that *"Plans need to provide for specialist housing for older people where a need exists. Innovative and diverse housing models will need to be considered where appropriate."*<sup>2</sup> The paragraph continues that *"Plan-makers will need to consider the size, location and quality of dwellings needed in the future for older people to allow them to live independently and safely in their own home for as long as possible, or to move to more suitable accommodation if they so wish."*
- 2.7 The initial results published from the Census 2021<sup>3</sup> indicate a significant increase in the number of people aged 65 and over in Chelmsford over the period 2011 to 2021. Indeed, the results demonstrate there has been a 26% increase in people aged 65 years and over (compared with a rise of 20.1% across England as a whole), with the largest rise in the 70 to 74 years category with a 50% increase. It is also notable that the number of people aged 90 years and over has increased by 41%. The initial figures demonstrate an ageing population in the district which will require an appropriate response within the local plan to ensure a commitment to meeting the needs of elderly people.
- 2.8 CODE therefore considers the review of the CCC Local Plan should include direct provision for specialist accommodation for elderly people, including age-restricted general market housing, retirement living or sheltered housing, extra care housing or housing-with-care and residential care homes and nursing homes. As recognised in the PPG, *"it is up to the plan-making body to decide whether to allocate sites for specialist housing for older people."* However, it is considered that allocations can provide a greater level of certainty for developers and can encourage the provision of sites in suitable locations. CODE therefore considers that specific allocations for elderly persons accommodation should be made in the reviewed Local Plan to ensure certainty in the provision of new sites over the plan period to meet identified needs.
- 2.9 It will also be important to consider the affordable housing requirements for sites providing specialist accommodation for elderly people. The PPG identifies the need to assess the viability of proposals for specialist housing for older people. At paragraph 015, reference ID: 63-015-20190626, the PPG emphasises that *"Plans can set out different policy requirements for different types of development."*

<sup>1</sup> Paragraph 001, reference ID: 63-001-20190626

<sup>2</sup> Paragraph 012, reference ID: 63-012-20190626

<sup>3</sup> [Chelmsford population change, Census 2021 – ONS](#), as accessed 20 October 2022



*These policy requirements should be informed by evidence of infrastructure and affordable housing need, and a proportionate assessment of viability that takes into account all relevant policies and local and national standards, including the cost implications of Community Infrastructure Levy and section 106.” The NPPF, at paragraph expects at least 10% of the total number of homes to be available for affordable home ownership. The policy makes exemptions to the 10% requirement, including for development which “provides specialist accommodation for a group of people with specific needs (such as purpose-built accommodation for the elderly or students.”*

- 2.10 CODE therefore would welcome early clarification from CCC regarding proposed affordable housing requirements, particularly where these relate to proposals for the provision of specialist accommodation for elderly people.

### **3. Ensuring sustainable patterns of development and protecting the Green Belt**

*Q21. Do you support the approach to be taken? If you disagree, please explain why?*

- 3.1 The Issues and Options consultation document states, at paragraph 5.43, that *“The NPPF reaffirms the Government’s commitment to the protection and permanence of the existing Green Belt. Chelmsford is on the edge of the Metropolitan Green Belt that encircles London with the areas to the south and west of the City within the Green Belt. Changes to the Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified.”*
- 3.2 It is noted at paragraph 6.39 of the Issues and Options document that CCC considers *“the additional development requirements needed through the review of the adopted Local Plan can be sustainably delivered at locations outside the Green Belt. These areas also have significant infrastructure improvements planned as part of the adopted Local Plan. As such, we do not believe that there are exceptional circumstances which would warrant a departure from national planning policy. Therefore, none of the Spatial Approaches would require a review of the Green Belt.”*
- 3.3 Respectfully, CODE submit that brownfield sites within the Green Belt could play an important role in assisting CCC in meeting the identified needs for specialist accommodation for elderly people. Settlements such as Margaretting (identified within table 8 of the Issues and Options document as a service settlement) can play a key role in the delivery of this type of accommodation. CCC will be aware of the provisions of paragraph 149 of the NPPF, which outlines exceptions to development within the Green Belt which would be considered to be inappropriate. This includes, at 149(g), *“limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:*
- *Not have a greater impact on the openness of the Green Belt than the existing development; or*
  - *Not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.”*



- 3.4 Paragraph 142 of the NPPF states that *“Where it has been concluded that it is necessary to release Green Belt land for development, plans should first give consideration to land which has been previously-developed and/or is well-served by public transport.”* CODE invite CCC to consider the relevant provisions of the NPPF in relation to its Call for Sites submission for Furze Hill, Margaretting.
- 3.5 CODE would therefore ask CCC to consider the potential for development to come forward on brownfield sites in the Green Belt to assist in the delivery of specialist accommodation for elderly people prior to concluding that no development can come forward within the Green Belt.

#### **4. Conclusions**

- 4.1 CODE welcome the opportunity to comment upon CCC’s Issues and Options consultation. As outlined within these representations, CODE is generally supportive of CCC’s approach to identifying the need for new homes and ensuring there is a sufficient buffer included within the local plan (at around 20% of the housing requirement) to provide flexibility in the supply of housing sites and help significantly boost the supply of housing to comply with the provisions of paragraph 60 of the NPPF.
- 4.2 Whilst these aims are supported, CODE also consider it to be of significant importance to ensure the needs of elderly people are appropriately recognised in the review of the local plan, to be complemented by direct provision of specialist accommodation for elderly people in a number of forms to ensure that the plan meets the needs of different groups.
- 4.3 CCC’s approach to the Green Belt is recognised, however, it is respectfully submitted that brownfield sites within the Green Belt can play an important role in meeting the needs for specialist accommodation for elderly people and should be appropriately considered in CCC’s evidence gathering and early assessment of site options. In addition to these representations, CODE has submitted a Call for Sites response with regard to a site at Furze Hill, Margaretting, which is considered to have potential to respond to the identified need for specialist accommodation for elderly people, on a site which could meet the exception to inappropriate development in the Green Belt in accordance with paragraph 149(g) of the NPPF.