



Frazer Halls Associates
Development Consultancy

Representations on Chelmsford Local Plan Issues and Options Consultation (Regulation 18)

Land at Drakes Farm, Chelmsford

On behalf of Cliffords Group Ltd

October 2022



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Appendices

Appendix A: Location Plan

1 Introduction

- 1.1 This submission is made Frazer Halls Associates (FHA) on behalf of Cliffords Group (“the Landowner”) to the Regulation 18 Chelmsford Local Plan Issues and Options (“I&O”) document published for consultation by Chelmsford City Council (“the LPA”) between 11 August and 20 October 2022.
- 1.2 This representation relates to Drakes Farm (the “Site”). A plan showing the extent and location of the Site is provided at Appendix A of this representation. FHA are actively promoting the Site for residential development.
- 1.3 We would be pleased to discuss any aspect of these representations in more detail if this would be of assistance to the Council and we look forward to engaging positively with the Council and other stakeholders in the ongoing preparation of the emerging Local Plan.
- 1.4 The Site has been previously promoted through the Local Plan process, submitted to the 2021 Chelmsford ‘Call for Sites’ (“CfS”) and has been assessed as part of the LPA’s 2021 Strategic Housing and Economic Land Availability Assessment (SHELAA) under reference CFS125.
- 1.5 This representation undertakes a detailed review and assessment of the I&O document, providing responses to specific questions that relate to and represent the Landowner’s interests as well as clearly illustrating the Site’s suitability and deliverability for a residential allocation.
- 1.6 This representation address Questions 1, 3, 19, 28, 30, 57, 61 and 62.



2 Response to I&O Questions

Q1. Do you agree with the challenges and opportunities identified for the review of the adopted Local Plan? If not, please explain why. Where possible, please support your answer with reference to any evidence.

- 2.1 We consider the LPA to have correctly scoped the relevant key challenges and opportunities to inform the review of their Local Plan, as listed at paras. 2.25 – 2.53 of the I&O document.
- 2.2 The National Planning Policy Framework (NPPF) requires local planning authorities to undertake a review of their Local Plan at least once every five years, as is statutorily required as per regulation 10A of the Town and County Planning (Local Planning) (England) Regulations 2012 (as amended). The Planning Practice Guidance (PPG) is also clear that strategic policies should cover a minimum 15-year plan period (ref: Paragraph: 064 Reference ID: 61-064-20190315).
- 2.3 It is therefore welcomed that the LPA are performing their statutory duty of reviewing their Local Plan within five years post adoption and are preparing strategic policies as part of the review of their Local Plan to cover the period up to 2041, a period of 15 years from 2026 (following a 5-year review of the Plan from the date of adoption in 2020).

Q3. Do you agree with the proposed updates to the Strategic Priorities? If not, please give the reasons for your answer. Please refer to the Strategic Priority number in Table 4.

- 2.4 We endorse the proposed strategic priorities (SPs) set out within Table 4 which continue to comprise the key strategic priorities for climate, growth and place.
- 2.5 The retention of SP2 (now SP5) 'Meeting the needs for new homes' is welcomed and is consistent with the Government's objective of significantly boosting the supply of housing.
- 2.6 We are also supportive of the new SP2 which seeks to promote smart, active travel and sustainable transport, seeking to support the provision of strategic and local transport infrastructure. SP2 should however also seek to encourage the distribution of development towards planned strategic infrastructure, for example the Chelmsford Northeast Bypass route and the opportunities this unlocks. Likewise this should be acknowledged and recognised within SP 4 to inform the sustainable distribution of development across Chelmsford utilising, where possible, strategic road infrastructure.



Q19. Do you have any views on the proposed ideas for new policies?

- 2.7 We are highly supportive of the provision of Biodiversity Net Gain (BNG) for all major developments as a positive mechanism for ensuring environmental enhancements and sustainability as part of all new growth coming forward over the new plan period.

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

- 2.8 The National Planning Policy Framework (NPPF) makes clear at paragraph 61 that use of the Standard Method to calculate a Local Authority's housing requirements is the preferred methodology, unless exceptional circumstances apply. The I&O draws reference to the NPPF in this regard and is explicit in the use of the Standard Method to calculate housing requirements over the plan period.
- 2.9 The PPG¹ provides further detail on how it expects the Standard Method to be applied. The PPG makes clear that the Standard Method is used to, explicitly, identify the *minimum* number of homes to be planned for across the LPA over the plan period. It recognises that in applying the minimum figure, other factors such as historic under-delivery and unmet housing need within neighbouring areas should also be considered in determining actual need.
- 2.10 It is therefore welcomed that the LPA recognise the need to calculate their minimum housing need over the plan period using the standard method as referred to at para. 55 of the I&O document.
- 2.11 The current adopted Local Plan installs a 20% buffer above the Housing Requirement figure of 805. As paragraph 5.54 of the I&O document alludes to, it is important in order to meet the Government's objective of significantly boosting housing supply, as set out in the NPPF, that strategic policy makers ensure there is sufficient flexibility and resilience in the supply of housing throughout the Plan period.
- 2.12 Use of a buffer is consistent with national policy, with the NPPF not only requiring a Local Plan to meet its objectively assessed development needs in full but to do so through a considered strategy which engenders sufficient flexibility to adopt and respond to rapid change. To ensure sufficient flexibility, the Local Plan, must account for the fact that both housing need and supply will inevitably fluctuate throughout the plan period due to a number of factors, including changes to population projections and affordability ratios, and sites failing to come forward as anticipated. Sufficient headroom is required over the plan period to respond rapidly to these changes.

¹ Paragraph: 002 Reference ID: 2a-002-20190220



- 2.13 A buffer is therefore important to account for these fluctuations, and overall housing need/ supply and is necessary to ensure the Local Plan is effective, consistent with national policy and is positively prepared.
- 2.14 It is therefore welcomed that the LPA recognises the importance of ensuring flexibility in the supply of housing in the Local Plan by proposing a minimum housing requirement over and above the standard method requirement and the potential risks in failing to do so to robustly meet the housing needs of specific groups over the plan period. Further, the LPA propose to retain a 20% supply buffer to further maintain flexibility in the supply of sites throughout the plan period.
- 2.15 We therefore endorse the LPA's approach to apply the standard method to calculate the minimum housing requirement and recognising that this is indeed a minimum figure and have therefore proposed a greater housing requirement with a 20% supply buffer to the supply of housing over the plan period.
- 2.16 We agree with the key outputs listed at para. 5.56 of the I&O document and endorse a proposed 10% buffer in the supply of deliverable sites in the first five years of the Plan to account for any fluctuations in the market, as per para. 74 of the NPPF. However, we also support identifying developable sites or broad locations for growth over years 6-10 and 11-15 of the plan period allowing larger sites to come forward later in the trajectory.



Q30. Should we be considering any alternative options for a housing supply buffer?

- 2.17 Given Chelmsford's strong record of housing delivery clearly demonstrated within the 2020, 2021, and 2022 Housing Delivery Test results (all in excess of 100% delivery of the LPA's housing requirement) we consider the retention of a 20% buffer is appropriate. The use of a 20% buffer will help the Local Plan account for the fact that both housing need and housing supply will inevitably fluctuate throughout the plan period due to several factors, including changes to population projections and affordability ratios, and sites failing to come forward as anticipated. Sufficient headroom is required over the plan period to respond rapidly to these changes.

Q57. Do you agree with the proposed updates to the Spatial Principles? If not, please give the reasons for your answer. Please refer to the Spatial Principle number in Table 7.

- 2.18 We support the proposed spatial principles at Table 7 of the I&O document.
- 2.19 We support principles (h) and (i) which aims to ensure development is served by necessary infrastructure and encourage innovation and seeks to locate development to utilise existing and planned infrastructure effectively.
- 2.20 Under these principles it is essential the Local Plan captures the opportunities and benefits unlocked through the delivery of new strategic road infrastructure, such as the proposed Chelmsford North East Bypass. Distributing growth towards areas and locations across Chelmsford that will be well served by future road infrastructure will enable a sustainable pattern of development and should be strongly promoted through the new Local Plan process.

Q61. Do you support the approach to be taken to review the Spatial Strategy? If you disagree, please explain why?

- 2.21 We support the LPA's approach to reviewing the spatial strategy, as noted at para. 6.11 of the I&O document that the LPA must undertake a whole plan review exercise, looking at the strategy holistically, to ensure the development needs of the Chelmsford City area are met in full up to 2041.
- 2.22 It is also welcomed to see meeting the needs for new homes as a policy objective. We note that at para. 6.17 the LPA recognise that there are several ways that growth can be accommodated and therefore where sites are allocated.

Q62. How do you feel about the types of locations for potential housing development growth:

Growth in urban areas

Expanding allocated sites

Development at larger villages

Development at smaller villages

Large new settlement/garden community

Please indicate whether you strongly support, neither oppose or support, oppose, strongly oppose.

Have we missed anything?

- 2.23 We welcome growth along transport corridors as a potential location for growth, with the Chelmsford North East Bypass recognised at para. 6.26 of the I&O documents. We would however urge the LPA to strengthen the recognition of the potential to accommodate and distribute growth towards this infrastructure, and strategic road infrastructure more widely.
- 2.24 Approach D is therefore supported in this regard where it promotes growth along transport corridors however we would request that the LPA include areas near the emerging the Bypass as potential locations for growth along transport corridors.



3 The Site and Deliverability

- 3.1 The Site measures c. 8.8 hectares and comprises agricultural land. The land does not currently benefit from a vehicular access into the Site however access is feasible from Drakes Lane.
- 3.2 The Site is located beyond any defined settlement boundary and falls within the Rural Area as per the adopted Local Plan (2020).
- 3.3 The Site will benefit from proximity to the emerging Chelmsford North East Bypass and will be north of the North East Chelmsford Garden Village. New residents will be able to benefit from the infrastructure, services, community facilities and amenities delivered at a critical mass through the emerging garden village.
- 3.4 The Site is not within a Conservation Area and does not contain nor lie in close proximity to any listed buildings.
- 3.5 The Site is in private ownership with no Public Rights of Way (PRoW) through, on or adjacent to the Site.
- 3.6 The Site is located in Flood Zone 1 (land least risk of flooding from tidal or fluvial sources of flooding).
- 3.7 In terms of agricultural land classification, no formal assessment has been undertaken however drawing upon the Natural England Agricultural Land Classification Map for the Eastern Region (2008), the land is classified as Grade 2 (Very Good). We would however issue caution against over reliance on this resource to define site specific land quality as this is a strategic tool to inform high level assessments of grade classification.
- 3.8 The Site is being actively promoted by the Landowners for a new residential allocation within the new Local Plan. There are no legal constraints, and the LPA can be confident that if allocated, the Site will be deliverable and form a robust part of the LPA's housing trajectory.

SHELAA 2021 Assessment – CFS125

- 3.9 Both parcels have been assessed as part of the Strategic Housing and Economic Land Availability Assessment (SHELAA) (2021) under reference CFS125.



- 3.10 Appendix 3 of the SHELAA Assessment sets out the scoring for each site. The Site scores a suitability score of 3, availability score of 1 and achievability score of 2. The SHELAA scores sites with high suitability, availability, and achievability with 1, and those with low suitability, availability and achievability with 3.
- 3.11 We note that the Site scores 1 against availability which is welcomed. The Site scores an achievability score of 2 as it is expected to be delivered in 10-15 years. Whilst we would expect the Site to come forward in accordance with the emerging infrastructure and development at Northeast Chelmsford, this is a longer timescale than we would expect to see the Site come forward in. We therefore suggest the Site should perform better against this criterion.
- 3.12 Appendix 3 of the SHELAA Report sets out the criteria for the scoring, and sites that are outside of defined settlement boundary and sites that score 0 against this criterion cannot receive an overall suitability score of lower than 3. We consider this to be a blunt application of the scoring system for the suitability of a site, as this assumes that just because a site falls outside of the development boundary, it can never be considered highly suitable for development regardless of the full planning context and characteristics of the site.
- 3.13 Likewise, as the Site scores 0 against the locality of neighbouring constraints it cannot score lower than 2. In this instance the Site is adjacent to existing B2 or B8 uses. We would query why this is identified as having 'no potential mitigation' as residential schemes can be designed to incorporate mitigation and suitable buffers to ensure compatibility to neighbouring commercial uses. We consider this a blunt and premature assessment and would urge the LPA to apply a more flexible approach to Sites with adjacent employment uses.
- 3.14 The Site also scores 0 against public transport, and 0 against minerals & waste constraints. The emergence of new road infrastructure to support the delivery of the Site will promote accessibility to modes of public transport, such as bus services, and again we question why the Site's presence in a minerals & waste safeguarding area automatically prejudices the Site for its suitability for development prior to any mitigation being scoped for future development.
- 3.15 The Site is therefore considered highly suitable, achievable and available for residential development considered highly deliverable through the new Local Plan. The Site is therefore considered highly suitable, achievable and available for a residential village extension at Broomfield, considered highly deliverable through the new Local Plan.



Appendix A: Location Plan



Unit A3 East Gores Farm, Salmons Lane , Coggeshall,
Essex, CO6 1RZ

Client: **Cliffords Group Ltd**
Project: **Land at Drakes Farm**

Title: **Location Plan**

Scale: 1:4500 @A4
Drawn By: RAB

Date: 20 Oct 2022
Drawing No: 22-161