

**Chelmsford Draft Local Plan:**

**Matter 5 – Week 1**

**Hearing Statement on behalf of:**

**Seven Capital Plc**

**Agent Consultation PID Number: 1160027**

## Matter 5 – Spatial Strategy

***32. Does the spatial strategy maximum the use of previously developed land in the plan area and is this based on a robust and up-to-date evidence base? Will it promote the vitality of the main urban areas in the area and support thriving rural communities as set out in the core planning principles in the Framework?***

No. Whilst the Spatial Strategy in Draft Policy 9 makes reference to focusing new housing growth '*...in the most sustainable locations by making the best use of previously developed land in the Chelmsford Urban Area...*' (SD001, Page 59), this is not followed through for the Strategic Growth Sites identified in Growth Area 1 – Central and Urban Chelmsford.

The quantum of development identified for the Strategic Growth Sites is implied as a 'maximum' figure, and therefore, does not seek to optimise the use of previously developed land. The reuse of previously developed land should be capable of development which maximises its redevelopment potential. It is fully acknowledged that this process would need to take account of any site constraints and surrounding designations. However, limiting the number of residential units does not support the Spatial Strategy.

It is acknowledged that transitional arrangements are in place for those draft Local Plans, such as the Chelmsford Draft Local Plan submitted prior to the publication of the NPPF 2018. Whilst this process ensures that the evidence base for such plans would not require updating, the implication is that, any planning application submitted to the LPA will be assessed against the provisions of NPPF 2018 as opposed to NPPF 2012. Therefore, should the Chelmsford Draft Local Plan be found to be sound and subsequently adopted, it could immediately be out of date with reference to other elements set out in NPPF 2018, such as the Government's rhetoric to maximise the use of previously developed land and increase densities in urban areas.

Furthermore, to maximise the use of previously developed land, particularly those sites identified in the draft Local Plan for redevelopment, the quantum of housing should not be set as a maximum. To ensure that the objective of the Spatial Strategy is applied consistently and that the policies and approach for the Strategic Growth Sites comply with the policies within NPPF 2018, the housing figure should be expressed as a minimum. This would also better reflect the Framework's requirement to 'significantly boost' housing supply (NPPF 2012 Para.47 and NPPF 2018 Para.59).