CHELMSFORD LOCAL PLAN

STATEMENT FOR PUBLIC HEARING

MATTER 3

PLAN DEFICIENCY

RE

Consultation PID Number: 1330674 Username:

Land east of Barn Mead, Galleywood

On behalf of J and T Wardrop and the Wardrop Trust PID 311979

SHELAA ref CFS20

Consultation PID Number: 1358377 Username:

Land east of Mayes Lane, Sandon

On behalf of families Wardrop, Pipe, and Speakman (client PID in name of J and T Wardrop and the Wardrop Trust 311979

SHELAA ref 22SHELAA7

1. My name is Christopher John Collins. I am a retired Fellow of the Royal Institution of Chartered Surveyors and hold a degree in Estate Management from the University of London. I am a Fellow of Anglia Ruskin University having brought to the City of Chelmsford a University at its centre. I have undertaken many planning matters in Chelmsford and have a Civic Award for a development. In the past I was a partner in renowned planning consultants Montagu Evans and Son, and was involved in many strategic planning cases.
2. I make this statement on behalf of the landowners and promoters of the above sites. This representation seeks to demonstrate that both sites comprise sustainable, available and deliverable development opportunities capable of making an important contribution towards meeting Chelmsford's future development needs. In particular, both sites have the ability to assist in addressing housing requirements within the plan period whilst providing flexibility, resilience and certainty to the Council's delivery strategy.
3. Both sites have been promoted through the Local Plan process and have been subject to assessment through the Council's Strategic Housing and Economic Land Availability Assessment. It is noteworthy that neither site has been discounted due to insurmountable technical, environmental or infrastructure constraints. Rather, their exclusion primarily reflects strategic policy choices which should now be reconsidered in light of changing national policy and the need for a robust, deliverable and positively prepared Local Plan.
4. It is considered the Local Plan is deficient in the absence of the sites being allocated for development.
5. **LAND EAST OF BARN MEAD, GALLEYWOOD (BECHERS SITE)**

6. A Sustainable and Deliverable Opportunity
7. The Bechers Site represents a highly sustainable development opportunity adjoining the existing built form of Galleywood. The Site is well related to existing residential development and benefits from ready access to local services, employment opportunities, healthcare provision, community facilities and public transport links. The title 'Bechers' comes from the name of a bungalow and front garden adjoining the Site and fronting the main road, which was developed several years ago. The Site itself is the part of the back garden and land enjoyed with Bechers and its development has always been regarded as the second phase of development of the overall Bechers land, with access and services available.
8. Unlike many larger strategic allocations, the site is available immediately and is capable of being brought forward without reliance upon substantial off-site infrastructure works or long lead-in periods. Consequently, it offers a realistic opportunity to contribute towards housing delivery in the short term.
9. Importantly, a Certificate of Lawfulness has already been granted for part of the site, confirming the existence of previously developed land. This is a significant material consideration and demonstrates that elements of the land possess characteristics which distinguish it from undeveloped Green Belt land.
10. Furthermore, the site has been the subject of pre-application discussions with Chelmsford City Council regarding the provision of extra care accommodation and other specialist housing solutions. As such, there is already a strong understanding of the development potential of the site and a clear indication that proposals could progress without unnecessary delay.
11. Meeting an Identified and Growing Need
12. The provision of housing for older people represents one of the most pressing challenges facing planning authorities across England.
13. National planning policy is unequivocal in requiring local plans to address the needs of different groups within society, including older persons, those requiring care and support, and those wishing to downsize from larger family homes. These social objectives in planning are very important if not essential.
14. Whilst the emerging Local Plan acknowledges the need for special housing, the strategy relies heavily upon provision being delivered as part of larger strategic urban extensions and growth locations. Whilst these allocations undoubtedly have a role to play, many are dependent upon extensive infrastructure investment and lengthy delivery programmes. The timing and quantum of specialist accommodation that will actually be delivered through such sites remains uncertain.
15. The Bechers Site provides the opportunity to deliver specialist accommodation now rather than at some undefined point in the future.
16. This distinction is important.
17. The Inspectors must consider not only whether the Plan identifies sufficient sites in principle, but whether those sites are capable of delivering accommodation within a realistic timeframe. The Bechers Site offers certainty of delivery and would make an immediate contribution towards meeting acknowledged needs.
18. Green Belt and Grey Belt Considerations

19. Historically, the site's progression has been constrained by Green Belt policy. However, the planning context has changed considerably. It is contended that the only reason why the land has not been brought forward is the Council's desire not to consider any Green Belt land at all, being blinkered to the benefits and need. There would be no material loss of the land to the Green Belt. Without the Green Belt concern, the SHELAA assessment would have had a 'green' light, and development of the land would have proceeded.
20. Recent changes to national planning policy place increased emphasis on the identification of previously developed and underperforming Green Belt land and establish a framework through which lower-performing Green Belt sites can be assessed more positively where there is an identified development need.
21. The Bechers Site is not representative of strategically important open countryside often associated with the fundamental purposes of the Green Belt. Instead, it is closely related to existing development, exhibits characteristics of previously developed land and forms a logical extension to the settlement pattern of Galleywood. It is not agricultural land, and its hedged and treed boundaries to the north and east would form a much better boundary to the Green Belt. The land is undoubtably 'Grey Land' within definitions contained in the NPPF, and it is hoped the City Council will agree this.
22. Its release would not undermine the wider integrity or strategic function of the Green Belt. Equally, the site does not display the openness, permanence or strategic role associated with those Green Belt locations most deserving of protection.
23. The Examination provides an important opportunity to reconsider whether the continued exclusion of the site remains justified when balanced against the acknowledged need for specialist accommodation and the requirement for a positively prepared Local Plan.
24. Wider Social Benefits
25. The planning benefits associated with this site extend far beyond the delivery of additional dwelling units.
26. Provision of retirement and extra care accommodation within Galleywood would allow existing residents to remain within their established community as their housing needs evolve. Older people could continue to access familiar services, healthcare facilities, social networks, family connections and community groups. In turn, this would facilitate the release of larger family housing into the local market, supporting wider housing mobility and contributing towards more efficient use of the existing housing stock.
27. These benefits are substantial and should attract significant weight. There is a need for care accommodation in the large Galleywood area and there is no other land allocated for such special residential purposes. It is contended that the Local Plan is deficient in not making this provision.

28. LAND EAST OF MAYES LANE, SANDON

29. An Available and Sustainable Housing Site
30. The land east of Mayes Lane represents a sustainable and deliverable housing opportunity capable of contributing towards the Council's housing requirements within the early years of the Plan period.
31. The site is available now and benefits from an established means of access. It is situated adjacent to an area characterised by a mixture of commercial, industrial and developed uses and cannot reasonably be described as a parcel of countryside detached from the urban area.

32. Its context is one of having an existing development influence rather than as having an attractive rural character.
33. The site therefore presents a logical location for future growth and has the potential to be integrated successfully with surrounding land uses.
34. It is considered that the Local Plan is deficient in not allocating this land and that the SHELAA assessment was marked incorrectly and should have had a 'green' light. The land is NOT in the Green Belt, nor offers a green buffer zone between settlements.

35. Deliverability and Flexibility
36. A sound Local Plan should not become overly reliant upon a limited number of large allocations. Experience throughout the country demonstrates that major strategic sites frequently encounter delays arising from infrastructure provision, viability considerations, land assembly issues, utility upgrades and market absorption rates. As a consequence, inspectors increasingly seek reassurance that local plans contain sufficient flexibility to respond to changing circumstances and unforeseen delays.
37. The allocation of the Mayes Lane site would assist significantly in this regard. It would provide an additional source of housing delivery independent of the larger strategic growth locations and help ensure that the Plan remains effective throughout its lifetime.
38. A greater variety of site sizes and delivery mechanisms inevitably results in a more resilient housing trajectory.

39. Long-Term Land Use Considerations
40. The site is currently in agricultural use. However, the land forms a relatively small parcel of land dissociated from other farmland, and its ongoing agricultural viability in itself is increasingly questionable. Heavy machinery needs to travel some distance to farm the land. The land does not form part of 'open' countryside, and is well away from the A12 road with its noise and air pollution.
41. Importantly the site lies within an area affected by mineral safeguarding designations. Whilst this does not guarantee future extraction (and the site would be very small for mineral extraction), it is nevertheless indicative of the fact that the land has long been recognised as accommodating development other than agriculture. The current planning strategy therefore needs to consider the realistic long-term role of the site rather than relying upon assumptions regarding its indefinite retention in agricultural use. There must be a presumption that the land is to be developed.
42. Contribution to a Sound Plan
43. The principal question for the Examination is whether the Local Plan is positively prepared, justified, effective and consistent with national policy. The inclusion of the Mayes Lane site would strengthen the Plan against each of these tests.
44. It would provide additional certainty of delivery, increase flexibility within the housing land supply, reduce dependency upon large strategic allocations and create a more balanced portfolio of sites capable of delivering homes throughout the plan period. The Site lies to the south of Chelmsford, where there is little other land being released, and would thus help to balance the growth of the City.

45. Furthermore, the site would contribute towards housing requirements without creating a requirement for major strategic infrastructure interventions, thereby representing a highly efficient and pragmatic addition to the Council's development strategy.

46. <u>CONCLUSION</u>

47. In conclusion, both the Bechers Site and the land east of Mayes Lane represent sustainable, available and deliverable development opportunities which would make valuable contributions towards Chelmsford's future growth requirements.
48. The Bechers Site presents a compelling opportunity to provide much-needed special and care accommodation in an accessible location, whilst also making effective use of previously developed land in part and contributing towards wider housing market objectives.
49. The Mayes Lane site offers an immediately available housing opportunity capable of strengthening delivery, increasing flexibility and improving the overall resilience of the Local Plan strategy.
50. Given the Council's acknowledged housing challenges, the need for specialist accommodation, and the importance of maintaining a deliverable and effective development strategy, it is respectfully submitted that both sites merit further consideration through this Examination and should be viewed as positive opportunities capable of supporting the soundness of the emerging Local Plan.
51. Again it is contended that the Local Plan is deficient without the allocations of the 2 sites, and that it is materially inconsistent with national decision making policies.

C j Collins 20/10/2026