

Examination of the Chelmsford Draft Local Plan

RWH Properties Limited

Matter 6: Housing Provision Q63 (a)

Inspector's Questions 63 (part a)

"Q63. Policy GR1 allocates Growth Sites within the Chelmsford Urban Area. Growth Sites 1i - 1v list objectives / criteria.

a. Are the Growth Sites policies? Do they clearly set out what development will or will not be acceptable within the site and would this be clear to a decision-maker? Is reference to safeguarded land and phasing justified?"

RWH Properties Limited Response to Question 63 (part a)

- 1. It is understood that Growth Sites 1i 1v are components of Policy GRI (Growth Sites in Chelmsford Urban Area). Policy GRI is clear in confirming the type of development (principally new homes) that will be acceptable at each of the Growth Sites.
- 2. The specific wording within the submitted Local Plan relating to Growth Site Is (Rear of 17 to 37 Beachs Drive) is unclear and also poorly defined for the purpose of a decision-maker assessing and determining a planning application for development of the site for housing.
- 3. Use of the words 'around 14 new homes' is unhelpful and unnecessarily restrictive on the potential to make efficient use of the site for new homes. It is submitted that alternative wording should be included to reflect the potential for the site to deliver up to 30 new homes. The enclosed indicative concept plans prepared by LAP architects identify that the site can quite reasonably provide between 26 and 29 dwellings based on either flats/town houses, or all flats schemes respectively.
- 4. As currently drafted, a decision-maker would be misled by the policy wording to expect a residential scheme of about 14 homes being the appropriate scale of development for this site. The current draft policy wording provides very little flexibility or scope to allow a proposal for additional homes that is acceptable in all other respects e.g. meeting new homes standards without causing unacceptable impacts to the amenity of existing neighbouring land uses. Section 11 of the NPPF, 2018, makes clear that planning policies should promote effective and efficient use of land in meeting housing needs, and those policies should make optimum use of previously-developed or 'brownfield' land.



- 5. As currently drafted, and when Policy GRI and Growth Site Is are read together, there is a further lack of clarity for a decision-maker on whether or not a Planning Brief or Design Code will be required for the purpose of planning for development of land to the rear of 17 to 37 Beachs Drive. It is submitted that, in the case of the Beachs Drive site, there is no requirement for a Planning Brief or Design Code. New home space standards, and the need for proposed redevelopment of the site to respect the amenity of existing land uses, are firmly established through national, local and Essex Design Guide standards. Clarity should be provided that a Planning Brief or Design Code is not required for Growth Site Is (land to the rear of 17 to 37 Beachs Drive).
- 6. Reference with the policy wording for Growth Site Is (land to the rear of 17 to 37 Beachs Drive) is not justified. It is submitted that the requirement for redevelopment of the land to the rear of 17 to 37 Beachs Drive within the period 2026-2031 is unnecessarily restrictive and unreasonable. The site is already allocated by the adopted Local Plan. The site is available and deliverable for residential development on completion of the Chelmsford Flood Alleviation Scheme, which is already underway and with full funding by the Environment Agency, the City Council and the South East Local Enterprise Partnership.
- 7. In conclusion, RWH Properties Limited fully supports the allocation within the new Local Plan of Growth Site Is, land to the rear of 17 to 37 Beachs Drive, for residential development. However, the inclusion of the wording 'around 14 new homes' is unnecessary and unreasonable taking account the ability for the site to deliver up to 30 new homes as evidenced by the enclosed illustrative concept drawings prepared by LAP Architects.
- 8. Land to the rear of 17 to 37 Beachs Drive provides a highly sustainable location for residential being adjacent to existing residential properties, within easy walking and cycling distance of Chelmsford town centre and representing previously developed (brownfield) land. In addition, the reference to phasing of residential development at the site to 2026-2031 is unnecessary, as there are no reasons why development at this site should not be brought forward ahead of this date.
- 9. Policy wording for Growth Site Is (land to the rear of 17 to 37 Beachs Drive) should be amended to refer to development of up to 30 new homes.
- 10. Policy wording for Growth Site Is (land to the rear of 17 to 37 Beachs Drive) should be amended to exclude any phasing restriction.
- 11. Both of the above recommended amendments to policy wording for Growth Site Is (land to the rear of 17 to 37 Beachs Drive) will ensure clarity for a decision maker considering development proposals for redevelopment of this site.

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