HS041

HEARING STATEMENT

Chelmsford Local Plan

Matter 3: Strategic Priorities, Development Requirements and Spatial Principles

On behalf of

Mr A.G. Speakman and Mr P.W.H Speakman

(ID: 1329445)

October 2026

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1. INTRODUCTION

1.1 This Hearing Statement has been prepared on behalf of Mr A.G. Speakman and Mr P.W.H Speakman ('the landowners) in response to Matter 3 (Strategic Priorities, Development Requirements and Spatial Principles) of the Matters, Issues and Questions published in respect of the examination of the Chelmsford City Local Plan ('the Draft Local Plan' or 'DLP').

1.2 This Hearing Statement includes responses to specific questions under Issue 2 (Spatial Principles), Issue 3 (Whether the Plan Makes Adequate Provision for Housing) and Issue 4 (Spatial Strategy).

1.3 The landowners are promoting the residential development of Land at Anchor Field, Danbury ('the Site') through the plan-making process.

1.4 The Site comprises the land reference 21SHELAA82 in the Council's Strategic Housing and Economic Land Availability Assessment (SHELAA) (2026).

1.5 The Site is not proposed to be allocated in the DLP.

1.6 Representations were made on the Regulation 19 Publication Draft Local Plan and Focused Consultation Additional Sites Addendum (2025) and in respect of the site, through which changes to the plan were sought to remedy identified defects of soundness.

1.7 Our position is that the DLP is capable of being made sound, but that modifications are required to ensure this is the case.

1.8 Under the 2026 National Planning Policy Framework (NPPF) transitional arrangements, it is recognised that the DLP will be examined in relation to the national policies contained within the December 2024 NPPF. Consequently, unless expressly stated otherwise, references to the NPPF in this Hearing Statement refer to the December 2024 NPPF.

2. ISSUE 2 – SPATIAL PRINCIPLES

Strategic Policy S1

Question 3.3. Does the policy provide the right approach to the distribution of development?

2.1 Yes. We support the approach to the distribution of development established through Strategic Policy S1 and, in particular, strongly support Spatial Principle(e), which seeks to "focus development at the higher order settlements outside the Green Belt and respect the development pattern and hierarchy of other settlements".

2.2 Danbury is identified as a Key Service Settlement and therefore represents one of the higher-order and more sustainable settlements within the settlement hierarchy. As set out in our Regulation 19 representations, this status reflects Danbury's accessibility to services, facilities and infrastructure. We therefore agree that directing an appropriate proportion of growth towards settlements such as Danbury represents a logical and sustainable approach to the distribution of development.

2.3 Land at Anchor Field (21SHELAA82) is particularly well placed to contribute towards that approach. The Site adjoins Danbury and represents a logical opportunity to extend the settlement in a manner that respects its existing development pattern. The Council's own SHELAA identifies the Site as available and achievable, with both components assessed as Green.

2.4 The Site also accords with Spatial Principle (a), which seeks development in "well-connected and sustainable locations". We therefore strongly endorse limbs (a) and (e), subject to these principles being properly reflected in the Spatial Strategy and distribution of housing growth.

Question 3.4 Does it provide a clear set of spatial principles that are in accordance with national policy including in relation to the Green Belt?

2.5 Yes. We consider Strategic Policy S1 provides a clear and appropriate set of spatial principles which establish a sustainable basis for the distribution of development. In particular, the combined effect of limbs(a) and(e) appropriately prioritises well-connected and sustainable locations and focuses development towards higher-order settlements outside the Green Belt, whilst recognising the established development pattern and settlement hierarchy.

2.6 This represents a balanced approach which allows development to be distributed across the settlement hierarchy rather than concentrated solely within Chelmsford Urban Area.

2.7 Taken as a whole, the Spatial Principles provide a clear framework for directing growth first towards sustainable and well-connected locations whilst recognising relevant environmental and infrastructure considerations. We therefore consider the approach to be appropriate and consistent with the overarching principles of national policy.

Question 3.7 Is the Policy approach effective and justified in addressing speculative development proposals?

2.8 Yes. The Spatial Principles provide an appropriate framework for addressing additional housing needs by directing development towards well-connected and sustainable locations and, in particular, focusing growth at higher-order settlements outside the Green Belt.

2.9 This provides a sound basis for directing additional housing growth towards settlements such as Danbury, which is identified as a Key Service Settlement and, for the reasons set out in response to Question 3.1 above, is well placed to accommodate proportionate additional growth. Our Regulation 19 representations similarly supported Danbury's position within the settlement hierarchy and identified its accessibility to services, facilities and infrastructure as supporting further sustainable growth.

2.10 We therefore consider the principles established by Policy S1 to be sound. However, their effectiveness in addressing additional housing needs will ultimately depend upon how different levels and distributions of housing growth are tested and subsequently translated into the Spatial Strategy and site allocations. The Spatial Principles establish the appropriate framework; the subsequent application of those principles must ensure that the potential of sustainable higher-order settlements, including Danbury, to accommodate additional housing is properly considered and utilised.

2.11 The omission of sites such as Land at Anchor Field highlight the deficiencies in the Council's approach to site selection and assessment of the site through the Integrated Impact Assessment (IIA).

3. ISSUE 3 – WHETHER THE PLAN MAKES ADEQUATE PROVISION FOR HOUSING

Strategic Policy S6

Question 3.10 is the housing requirement of 1,210 dpa justified, evidence-based and consistent with national policy?

3.1 No. Whilst it is acknowledged that the Council has sought to utilise the transitional arrangements within paragraphs 234 and 235 of the NPPF, which enable qualifying plans whose draft housing requirement meets at least 80% of local housing need to continue to be examined under the relevant previous Framework, compliance with those transitional provisions does not, in itself, demonstrate that a requirement of 1,210 dwellings per annum (dpa) is justified or represents the most appropriate strategy. The Council has chosen to make provision for a minimum of 22,990 homes at an average of 1,210 dpa through Policy S6.

3.2 The Plan is being examined against the December 2023 NPPF. Paragraph 60 establishes the Government's objective of "significantly boosting the supply of homes" and states that the overall aim should be to meet as much of an area's identified housing need as possible. Paragraph 61 identifies the Standard Method as the starting point for establishing the housing requirement. Paragraph 35 additionally requires a sound plan to be positively prepared, justified, effective and consistent with national policy.

3.3 These objectives are especially important in Chelmsford. The Council formally declared a Housing Crisis on 22 February 2022, and its Housing Strategy identifies affordability, homelessness and the shortage of affordable housing as significant challenges. The Strategy records more than 300 families and individuals as homeless at that time and identifies affordable housing as being in very short supply. Against that context, we consider that there is a particularly strong justification for maximising sustainable housing delivery rather than treating the minimum threshold necessary to benefit from the transitional arrangements as the appropriate requirement.

3.4 We acknowledge that a higher-growth alternative has been tested through the IIA. As recorded by the Council in its September 2026 response to the Inspectors' Initial Questions (CC01), its position is that Option 3 performed more poorly overall than submitted Option 2a, including because of "greater resource use, strategic highway capacity constraints, and greater uncertainty with delivery".

However, we do not consider that conclusion demonstrates that 1,210 dpa is the most appropriate strategy when considered against reasonable alternatives.

3.5 In particular, the assessment does not adequately consider whether additional housing could instead be accommodated through a greater number of appropriately selected, deliverable sites at higher-order settlements. This is important because meeting additional need does not necessarily require reliance upon further large strategic sites. The Council's own spatial principles recognise the role of well-connected and sustainable locations and higher-order settlements outside the Green Belt. A strategy which supplements strategic growth with smaller and medium-sized sites in such locations could diversify supply and reduce reliance upon sites with substantial strategic infrastructure requirements or longer lead-in periods.

3.6 Land at Anchor Field, Danbury (21SHELAA82) illustrates this point. Danbury is identified as a Key Service Settlement, whilst the Council's SHELAA identifies Anchor Field as available and achievable. Our Regulation 19 representations explain why the identified site-specific constraints can be addressed through design and mitigation and why the Site provides an opportunity to contribute towards housing delivery at a sustainable higher-order settlement. The subsequent Regulation 19 Addendum representations also raised concern that the IIA's grouping methodology did not adequately assess individual sites on their own merits, instead creating a false choice between groups of smaller sites and larger strategic growth options.

3.7 This is also relevant to the mix of sites required by national policy. The question is not simply whether a higher numerical requirement has been tested as a single strategic option, but whether reasonable means of delivering that additional growth have been adequately explored. A fuller assessment of additional smaller and medium-sized opportunities at sustainable higher-order settlements could produce materially different conclusions in respect of infrastructure impacts, deliverability and overall sustainability.

3.8 Accordingly, we do not consider 1,210 dpa to be sufficiently justified or consistent with the national policy objective of significantly boosting housing supply. The transitional arrangements provide a route by which the Plan may continue under the previous Framework; they should not be treated as an objective or ceiling for housing provision. Given Chelmsford's acknowledged housing crisis and the availability of further sustainable and deliverable development opportunities, the Council should seek to maximise housing delivery through a broader portfolio of sites, including additional sites at higher-order settlements such as Danbury.

Question 3.11 Do the potential implications of using the higher Standard Method figure justify the lower figure in Policy S6?

3.9 No. For the reasons set out in response to Question 3.10, we do not consider that the potential implications identified through the IIA justify limiting the housing requirement to 1,210 dpa. The key issue is not simply whether accommodating the higher Standard Method figure would give rise to additional effects, but whether those effects can be satisfactorily addressed through an appropriate distribution, scale and mix of development sites.

3.10 Meeting a higher requirement need not rely upon additional large-scale strategic development. A broader portfolio of smaller and medium-sized sites at sustainable higher-order settlements, including available and achievable sites such as Anchor Field, could accommodate additional growth whilst diversifying supply and reducing reliance upon strategic sites.

Question 3.12 Are there any risks to the delivery of housing as a result of the supply buffer?

3.11 Yes. As set out in our Regulation 19 representations, the proposed supply buffer is 1.4%, substantially below the 16–18% buffer historically incorporated by the Council. The Council's own Housing Topic Paper explained that the buffer had been reduced to 1.4% to assist in achieving the increased housing requirement whilst complying with the transitional arrangements.

3.12 Such limited headroom creates a clear risk to the resilience of the housing trajectory. Housing sites do not invariably deliver at the rate or time anticipated and a Local Plan covering a lengthy period must be sufficiently flexible to respond where individual sites are delayed or delivery assumptions change. This concern is reinforced by the circumstances which led to the Regulation 19 Addendum, with the Council identifying additional sites following slower than anticipated delivery or non-delivery of existing allocations and the loss of a five-year housing land supply.

3.13 A more diverse portfolio of sites would provide greater resilience. In particular, allocating additional deliverable sites at sustainable higher-order settlements, including Land at Anchor Field, would provide additional headroom and reduce reliance upon a relatively limited number of larger sites. We therefore consider that additional supply should be incorporated into the Plan to provide a meaningful contingency against non-delivery and delay, thereby improving its effectiveness over the plan period.

Question 3.13 Are there particular constraints to identifying additional sites within the Plan period in the event of housing and employment development not coming forward as envisaged?

3.14 We are not aware of any particular constraints which would prevent additional sites from being identified. Indeed, the Council's evidence base already identifies a wider pool of potential development opportunities through the SHELAA, including sites which are available and achievable.

3.15 Land at Anchor Field (21SHELAA82) is one such opportunity. The Site has been assessed as Green for availability and achievability, demonstrating that additional deliverable opportunities exist outside the allocations currently proposed.

3.16 However, rather than relying upon the identification of further sites after delivery problems arise, the more effective approach would be to provide sufficient flexibility and contingency within the Plan from the outset. Allocating a broader portfolio of suitable sites, particularly at sustainable higher-order settlements such as Danbury, would reduce the risk associated with individual allocations not coming forward as envisaged and strengthen the resilience of the housing supply.

4. ISSUE 4 – THE SPATIAL STRATEGY

Strategic Policy S7

4.1 The overriding strategy in the Plan is to first make use of previously developed land within Chelmsford Urban Area and then to allocate land for development in:

a. Sustainable Urban Extensions (SUEs)

b. two new garden communities, underpinned by Garden City Principles

c. expansion of existing established employment sites

Question 3.17 Is this approach justified, soundly based and consistent with national policy?

4.2 Not fully. We support the principle of making effective use of previously developed land and recognise that Sustainable Urban Extensions (SUEs) and garden communities can form an appropriate and sustainable component of the spatial strategy. However, we consider that the strategy places too great a reliance upon large strategic sites and insufficient emphasis upon distributing growth to smaller and medium-sized deliverable sites at sustainable higher-order settlements.

4.3 This is particularly important given the scale of individual strategic allocations. Policy S7 provides for 5,579 homes at North East Chelmsford (Chelmsford Garden Community) and 3,000 homes at East Chelmsford Garden Community (Hammonds Farm), alongside other substantial allocations.

4.4 Strategic sites necessarily involve substantial infrastructure, masterplanning and coordination before and during delivery. Policy S7 itself recognises that development must secure the timely provision of necessary supporting infrastructure and that Strategic Growth Sites will be delivered in accordance with Council-approved masterplans. A more diversified portfolio, incorporating additional smaller and medium-sized sites capable of contributing earlier in the Plan period, would therefore provide greater resilience.

4.5 This could be achieved consistently with Policy S7's own settlement hierarchy. The Policy identifies Danbury as a Key Service Settlement outside the Green Belt and expressly identifies development around Key Service and Service Settlements outside the Green Belt as part of the Spatial Strategy.

Question 3.18 Given the Plan's reliance on meeting development needs in the SUEs and new garden communities and taking into account their scale, is there sufficient flexibility and resilience built into the Plan to deliver the housing growth envisaged, in the event of any underperformance of these allocations?

4.6 No. Our principal concern is the consequences for housing delivery if one or more of the major allocations delivers later or more slowly than anticipated. Given the substantial contribution expected from the SUEs and garden communities, underperformance on a relatively small number of strategic sites has the potential to materially affect the overall housing trajectory.

4.7 This risk reinforces the need for a broader and more diverse portfolio of housing sites. Smaller and medium-sized allocations at sustainable higher-order settlements can make an important complementary contribution, providing opportunities for earlier delivery and flexibility where larger strategic developments experience delay. As set out in response to Question 3.12, this is particularly important given the limited overall supply buffer.

4.8 The answer is therefore not to move away from SUEs or garden communities, but to supplement them with additional deliverable allocations so that maintaining housing delivery and a robust five-year housing land supply is not disproportionately dependent upon the performance of a small number of strategic sites. Land at Anchor Field, which the Council's SHELAA identifies as available and achievable, provides one such opportunity at the Key Service Settlement of Danbury.

Question 3.19 What alternative approaches were tested in the preparation of the Plan?

4.9 We recognise that alternative spatial approaches have been considered through the Council's IIA. However, as explained in our Regulation 19 Addendum representations, our concern is that the alternatives considered do not adequately test a genuinely diversified strategy comprising strategic growth alongside a greater portfolio of smaller and medium-sized sites at sustainable higher-order settlements.

4.10 In particular, the Addendum IIA grouped sites into broader options rather than undertaking a meaningful comparison of all individual sites on their own merits. Our representations identified the resulting risk of creating a false binary choice between groups of smaller sites and large strategic growth options.

4.11 A reasonable alternative worthy of proper consideration is a more balanced distribution which retains the sustainable strategic allocations but supplements these with additional deliverable sites at higher-order settlements outside the Green Belt. This would accord with Policy S7's own

identification of Danbury as a Key Service Settlement and would provide greater diversity and resilience within the housing trajectory.

4.12 Land at Anchor Field is an example of how that alternative could operate in practice: additional growth at an established Key Service Settlement, through a site assessed as available and achievable, complementing strategic-scale development while providing an additional source of housing supply.

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