Chelmsford Local Plan – Matter 6: Site Selection (ID: 1398045)

1. Introduction

1.1 This Hearing Statement has been prepared by This Land in response to Matter 6 (Site Selection) 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 responds to Question 6.1 under Site Assessment and Selection.

1.3 This Land is promoting Land at Main Road, Boreham ('the Site') for residential development through the plan-making process.

1.4 The Site comprises land identified as CFS9 and CFS59 within the Council's Strategic Housing and Economic Land Availability Assessment ('SHELAA').

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

1.6 Representations were submitted to the Regulation 19 Pre-Submission Draft Local Plan and subsequently to the Regulation 19 Pre-Submission Addendum, through which modifications to the Plan were sought to address identified soundness concerns, including the omission of Land at Main Road.

1.7 Our position is that the DLP is capable of being made sound, but that modifications are required, including the allocation of Land at Main Road for residential development.

1.8 Under the relevant NPPF transitional arrangements, the DLP will be examined against the applicable previous national policy framework. Unless expressly stated otherwise, references to the NPPF in this Hearing Statement are to that applicable Framework.

1. SITE ASSESSMENT AND SELECTION

Question 6.1 What was the Council's approach to site assessment and selection? What was the process and what factors were taken into account? What evidence is the Council relying on?

2.1 Sites submitted through the Council's Call for Sites are assessed through the Strategic Housing and Employment Land Availability Assessment (SHELAA). The SHELAA forms part of the Local Plan evidence base and provides a high-level assessment of

promoted sites, including their suitability, availability and achievability. It does not itself determine whether a site should be allocated, but informs subsequent decisions concerning the selection of development sites.

2.2 The robustness and consistent application of that assessment is therefore important. Although the SHELAA is not itself an allocation exercise, its findings inform the consideration of sites through the wider plan-making process. An inaccurate or outdated assessment of a site's suitability, availability or achievability therefore has the potential to affect whether a reasonable development alternative is appropriately considered.

2.3 The SHELAA uses a RAG assessment to distinguish between sites according to the constraints identified and their suitability, availability and achievability. The assessment must therefore be sufficiently clear and transparent to establish why different sites receive different ratings and how identified constraints have influenced the overall assessment.

2.4 This is directly relevant to Land at Main Road. The Site comprises two parcels identified as CFS9 and CFS59. In the assessment relied upon at Regulation 19, CFS9 was assessed Green for suitability and achievability but Yellow for availability. CFS59 was assessed Green for availability and achievability but Amber for suitability.

2.5 The availability rating applied to CFS9 does not reflect the current position. Our Regulation 19 representations confirmed that the Site was within This Land's control and that representations had previously been made to the Council confirming that position. A pre-application enquiry and meeting had also taken place in 2024. Our subsequent Addendum representations expressly confirmed full landowner support for the promotion and allocation of the Site. The basis for the Yellow availability rating has therefore been addressed.

2.6 Accordingly, CFS9 should properly be considered on the basis that there is evidence supporting its suitability, availability and achievability. Indeed, our Addendum representations explained that, with landowner support confirmed, CFS9 should be regarded as Green across all three considerations and therefore represents a deliverable and sustainable option for allocation.

2.7 The assessment of CFS59 raises a different issue. Whilst that parcel was assessed Green for availability and achievability, it received an Amber rating for suitability. Our Regulation 19 representations expressed concern that the assessment of the land parcels did not adequately recognise their accessibility, including the relationship with Beaulieu Park Station and the associated transport hub.

2.8 This wider sustainability context is important to the assessment and selection of the Site. Boreham is identified as a Key Service Settlement and benefits from a range of

local services and facilities and public transport connections. Our Regulation 19 representations also identified the contribution of Beaulieu Park Station and its associated transport infrastructure to the accessibility of the Site. Notwithstanding Boreham's position within the settlement hierarchy, no new housing allocation is proposed at the settlement.

2.9 Our concerns extend beyond the SHELAA assessment to the subsequent process through which reasonable alternatives were selected and appraised. The Regulation 19 Addendum IIA considered two broad options, with Option 1 comprising Regulation 19 sites, increased capacities and additional small sites, and Option 2 comprising Regulation 19 sites together with an additional strategic site or sites. Land at Main Road was not incorporated into either option.

2.10 That omission is significant. Our Addendum representations questioned why some sites were included within Option 1 whilst Land at Main Road was excluded, particularly given the evidence concerning the Site's suitability, availability and achievability. They specifically argued that the Site should have been considered as part of Option 1.

2.11 We also raised concern with the grouping of sites before their assessment through the IIA. The effect is that individual opportunities may not be considered on their own particular sustainability and deliverability merits. Our representations argued for a more robust assessment which compares sites individually against the sustainability objectives and, where appropriate, considers whether sites can deliver independently rather than only as part of wider groupings or strategic growth options.

2.12 In the case of Land at Main Road, this process means that a site adjoining a Key Service Settlement, and for which suitability, availability and achievability evidence exists, has not been individually tested as a reasonable alternative through the Addendum IIA. The site-selection process therefore does not adequately demonstrate why Land at Main Road was omitted whilst other additional sites were progressed.

2.13 We therefore consider that, whilst the SHELAA provides an appropriate starting point for site assessment, the subsequent site-selection process has not adequately considered Land at Main Road on its current merits. In particular, the availability position for CFS9 has been resolved, whilst the Site's relationship with Boreham and sustainable transport connections support its credentials as a reasonable development opportunity.

2.14 This is particularly relevant given the housing delivery issues addressed elsewhere in our Hearing Statements and the Council's decision through the Addendum to identify additional sites following delays in delivery. In those circumstances, reasonable opportunities at sustainable higher-order settlements should be properly assessed before being excluded from the Plan. Land at Main Road should therefore be

reconsidered as part of the site-selection process and as an additional residential allocation.