CARNEYSWEENEY

HS030

PLANNING AND REGENERATION

Hearing Statement
Matter 3 - Strategic Priorities, Development Requirements and Spatial Principles



Client Name: Hammonds Estates LLP and Wates Developments

Site Address: East Chelmsford Garden Community (Hammonds Farm)

Date: 21 October 2026

Chelmsford Local Plan Review Examination

Representor ID: 872955
On behalf of: Wates Developments Ltd and Hammonds Estates LLP
Date: 21 October 2026

Issue 1 – Whether the Plan will be effective in addressing the Strategic Priorities for the climate, growth and place

Question 3.1 - Do the Strategic Priorities (climate; growth; and place) provide a sound basis on which to underpin the strategic policies in the Plan in order to deliver its vision?

1.1.1 Yes. Climate, growth and place are all themes that run throughout national policy. Paragraph 35 of the NPPF (December 2023) states that for soundness Plans should be consistent with national policy, and it is clear that the Council's Strategic Priorities accord with the NPPF. We agree that these themes provide a sound basis for the Plan's setting of strategic policies.

Question 3.2 - The Plan period is 2022 to 2041. What is the Council's anticipated date of adoption? Would the strategic policies of the Plan look ahead over a minimum of 15 years from adoption as required paragraph 22 of the National Planning Policy Framework (the Framework)? Is the approach justified, effective and consistent with national policy?

1.1.2 The Local Plan is anticipated to be adopted in early 2027 giving the plan a 14-year time period to 2041. Although this falls just short of the preferred 15-year time period suggested by Paragraph 22 of the NPPF, pragmatism is warranted, given that the slippage in the Chelmsford Local Plan process is largely due to the significant uplift brought about by changes to the government's Standard Method published in August 2024 and December 2024, and for the reason that Paragraph 22 says 'should' and not 'must'. The Local Plan Review's allocations look further ahead and include a strategic growth site (Site 16a) that will deliver well into the next plan period (the allocation provides for the delivery of around 1,500 homes post 2041), so there is preparedness for long-term delivery and no deficiency in the Council's approach.

Issue 2 – Spatial Principles

<u>Strategic Policy S1</u>

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

1.1.3 Yes. As per Paragraph 2.2.1 of our representations (Rep PS25-336) we continue to support Strategic Policy 1. It is evident from the Council's Integrated Impact Assessment (IIA) testing process that the plan's spatial principles have been well tested and result in an appropriate distribution of development that will shape the delivery of sustainable development (as discussed in Matter 1). It is also judged that

the Spatial Strategy and site selections have been made in accordance with these Spatial Principles, resulting in a sound plan that is prepared on robust principles.

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?

1.1.4 Yes. As per our representations (Rep PS25-336) it is considered that in focusing development in and close to Chelmsford's main Urban Areas and Key Service Settlements outside of the Green Belt, and proposing the allocation of a new garden community, the Plan's spatial principles accord with NPPF Paragraph 74 (planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes); Paragraph 124 (using suitable brownfield land within settlements), and Paragraphs 142-145 (attaching great importance to Green Belts and only altering them in exceptional circumstances). The principles requiring the delivery of infrastructure, deliverable development and appropriate responses to context including matters of landscape, climate, flood risk and historic and natural environment are also clearly supported by national policy.

Question 3.6 - Does it provide flexibility to achieve sustainable development through a range of site types and sizes?

1.1.5 Yes. The submitted Local Plan includes a range of site allocations identified through both the Pre-Submission Local Plan (SD001) and the Focused Consultation Additional Sites document (SD002) which accord with the Spatial Principles. The variety of allocations put forward – sites comprising 11 to 5,579 homes; eight sites providing circa 100-300 homes; brownfield and greenfield sites, and sites expressly allocated for specialist forms of housing (Sites 9b and 9c) - provide flexibility to achieve sustainable development. A significant proportion of development will be delivered through larger strategic sites with supporting infrastructure delivery, whilst small and medium sized sites make an important contribution to the development trajectory. The two 'very large' garden communities (Sites 6 and 16a) will contribute approximately 43% of the total supply over the plan period (following the inclusion of the Additional Sites), with the remainder of the plan's supply comprised of previously developed sites within Chelmsford city (2,772 homes; 14% of supply), large strategic extension sites of 750-1,220 homes (Sites 2, 7a and 10; 14% of supply), and delivery from many sites below 390 homes. This is a differentiated strategy that offers resilience and flexibility.

1.1.6 Of the two garden communities, Site 6 (North-East Chelmsford) already has planning consent and can begin contributing to delivery in the first five years of the plan. The newly proposed garden community, Site 16a, will be delivered as a phased development with distinct neighbourhoods, varied densities and character areas, allowing a mix of housing types and tenures including specialist forms of housing to be delivered, helping create a sustainable development.

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?

1.1.7 Yes. Section 8.1 of our Regulation 19 Representations (Rep PS25-310) sets out why Wates consider the housing requirement of 1,210 dpa to be justified, evidence-based and consistent with national policy requirements.

1.1.8 The Council's evidence base, including the Strategic Housing Needs Assessment and the IIA assessment of the housing requirement figure and reasonable alternatives to it (IIA007 Paragraph 6.4.43 and the supplementary assessment tables on pp.186-201), demonstrates that the housing requirement of 1,210dpa has been robustly tested. The Council concluded that Option 2a with a housing figure of 1,210 dpa is a more sustainable strategy when assessed against reasonable alternatives.

1.1.9 The government's Standard Method, when recalculated in December 2024, resulted in a 59% increase in Chelmsford's LHN calculation, the highest annual need in Essex. The Council has assessed the ability to deliver the higher level of 1,406 dpa in full; this option performed more poorly, and we support the Council's conclusion. Whilst meeting full needs is always optimum, the Local Plan is looking to deliver a 50% increase in its housing need, which is a significant boost to the area's housing supply in line with paragraph 60 of the NPPF whilst seeking to achieve sustainable forms of development.

1.1.10 The transitional arrangements establish that a draft housing requirement of at least 80% of LHN is sufficient for the plan to remain within the legacy NPPF regime; they do not prescribe that the housing requirement must equal LHN. The Council's justification for the level of the housing requirement is found in the plan's evidence base, including the SHNA and the assessment of reasonable alternatives in the IIA, not in the transitional arrangements themselves. Chelmsford's application of the transition arrangements and pursuit of a housing requirement exceeding 80% of LHN, is consistent with that being applied elsewhere (for example, Cherwell District Council, Middlesbrough Council and Harborough District Council). The Council's approach to selecting its housing requirement is therefore justified by evidence and sound in policy terms.

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

1.1.11 Yes, the Council's IIA assessment of the housing requirement figure and reasonable alternatives to it (IIA007 Paragraph 6.4.43 and the supplementary assessment tables on pp.186-201), clearly demonstrates that the housing requirement of 1,210dpa has been robustly tested and justifies the Council's choice of the lower figure.

1.1.12 From a pragmatic point of view, meeting the Standard Method figure in full would have resulted in significant plan-making delays as a result of commissioning necessary amendments to the evidence base, which would greatly risk the Council's ability to have an up-to-date plan in place and defend against unplanned development. Such a strategy would contradict the government's objective of achieving universal local plan coverage and plan-led development. Chelmsford has a track record as a proactive plan-making authority, and we are confident that it will review its plan in five years' time to maintain an up-to-date plan.

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

1.1.13 The Council has been transparent in transferring a previously identified housing buffer as a pragmatic way to meet the uplift in the Standard Method when the plan was already at an advanced stage. The Council had previously opted to consult upon a Regulation 18 Preferred Option version of the plan with a 20% supply buffer included, despite the NPPF not requiring a supply buffer, nor there being a consequential Housing Delivery Test requirement for a buffer (Chelmsford has consistently exceeded 100%, the latest result being 110%). It had therefore already generated the technical evidence necessary to justify a spatial strategy with this level and scale of development.

1.1.14 Meeting a significantly increased housing requirement has meant a reduction in the size of the supply buffer to 8.4% following the Additional Sites consultation. Importantly, these sites have been added to strengthen the five-year supply position following the change of ownership and delay of three of the adopted plan's major sites, and therefore to strengthen the plan's flexibility and resilience. An 8.4% buffer remains a healthy supply buffer, and there is no reason to doubt that housing delivery will be maintained on this basis.

1.1.15 As discussed above, there is a diversity of site types and sizes in the Plan, so there is no reason to doubt that delivery will be maintained in line with the Council's trajectory.

Question 3.16 - Does the Plan provide a robust approach to the provision of sites for Gypsies and Travellers and Travelling Showpeople in accordance with national policy?

1.1.16 The identified need is underpinned by the Gypsy and Traveller Accommodation Assessment in 2023 (AH003), in accordance with the National Planning Policy for Traveller Sites (PPTS, December 2024).

1.1.17 Supporting Paragraph 6.14 of the Pre-Submission Local Plan (SD001) explains that the Council expects this need to be "provided on all suitable large strategic development allocations", and the remaining met through regularisation of existing pitches/plots and windfall applications. The proposal to co-locate with site allocations or settlements accords with Policy H26 of the PTTS which seeks to limit sites "away from existing settlements or outside areas allocated in the development plan".

Issue 4 – The Spatial Strategy

Strategic Policy S7

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?

1.1.18 Yes. We continue to support the Plan's spatial strategy and consider that it will continue to contribute to the achievement of sustainable development and meet identified needs.

1.1.19 Paragraph 123 of the NPPF identifies that strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed land. Additionally, Paragraph 74 sets out that the supply of larger numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements of significant extensions to existing villages and towns. The approach under Policy S7 is therefore consistent with national policy.

1.1.20 The Spatial Strategy is underpinned by the Council's Sustainability Appraisal (SA), which as directed by Section 19(5) of the Planning and Compulsory Purchase Act 2004, has guided the selection and development of policies and proposals in terms of their potential social, environmental and economic effects. This SA makes reference to the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 ((commonly referred to as the 'Strategic Environmental Assessment Regulations'). The Council's steps in preparing the Spatial Strategy and assessing the effects of its policies are considered well evidenced. It is therefore considered that Policy S7 is based on proportionate evidence and is therefore justified.

1.1.21 The plan has been positively prepared throughout and meets the relevant tests set as a legacy plan for meeting needs.

1.1.22 The evidence prepared in support of the plan demonstrates that the Plan will be effective, ie deliverable.

1.1.23 Thus it is considered that the Local Plan and spatial strategy comply with the soundness tests in paragraph 35 of the NPPF.

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?

1.1.24 Whilst the Spatial Strategy allocates a number of strategic urban extension sites, it is believed that there is not an over-reliance on new garden communities to meet development needs; rather, they contribute a well-reasoned proportion of the Plan trajectory and have been selected in order to secure corresponding infrastructure delivery and scale benefits. Paragraph 9.3.12 of Wates' representations identifies that the garden community allocations contribute 43% (as amended following the Additional Sites inclusion) of Chelmsford's housing supply, with the remainder comprising a wide range of sites at different scales as described in Question 3.6 above. North-East Chelmsford (Site 6) is well advanced and represents the extended delivery of earlier allocations, and the East Chelmsford Garden Community site-specific IDP appended to Wates' representations (Rep P25-242) demonstrates that there is ample time during the plan period for site 16a to commence delivery, deliver the necessary infrastructure and to meet the planned trajectory requirements. Detailed commentary on this matter is provided at paragraphs 9.3.1 to 9.3.12 of our Representations (Rep PS25-317), confirming that the site is deliverable and that in respect of Site 16a the Council's trajectory is sound. Moreover, with a single site owner and progress underway on a masterplan, there is ambition to achieve the timescales required without delay. The Additional Sites added at the Focused Additional Regulation 19 stage add resilience to the Council's five year housing land supply.

1.1.25 It is considered that there is sufficient flexibility and resilience built into the proposed site allocations (see Question 3.6).

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

1.1.26 This is well summarised in Paragraphs 4.78 to 4.99 of the Council's Topic Paper on Spatial Strategy and Strategic Sites (TP010).

<u>Strategic Policy S8</u>

Question 3.20 - Does the Plan provide sufficient flexibility to respond to changes to future logistics and economic growth?

1.1.27 Yes. Policy S8 provides sufficient flexibility to respond to changes to future logistics and economic growth. The Policy supports economic growth by promoting the diversification of Chelmsford's economy across a broad range of sectors. Additionally, the plan supports market-responsive employment allocations: the allocations have flexible use classes to enable adaptation to changing market demands over the plan period. This is supported by the Employment Land Review (ELR) Focused Update (2024; ECON003) which emphasises the need for flexibility.

Question 3.21 - Is the evidence underpinning the employment requirement justified and consistent with national policy?

1.1.28 Yes. The employment requirement is underpinned and justified by the Employment Land Review 2023 (ECON002) and the ELR Focused Update 2024 (ECON003), which has assessed future employment needs using three growth scenarios to inform the Local Plan approach to economic growth and employment policies:

- Scenario 1: Labour Demand – Forecasts of Job Growth
- Scenario 2: Past Development Rates
- Scenario 3: Future Labour Supply

1.1.29 ECON003 recommends that the Local Plan should meet Scenario 1 (Labour demand) as the minimum employment space requirement, identifying a need for 86,333sqm to 2041. The Local Plan proposes a minimum of 173,146 sqm of new employment floorspace under Strategic Policy S6, significantly exceeding the minimum requirement identified in ECON003. There is a small shortfall for industrial/distribution uses under Scenario 1; however it is acknowledged that the Local Plan site allocations are flexible enough to accommodate this.

1.1.30 Scenario 3 forecasts a higher employment requirement of 280,758sqm, and being based on labour supply this would tend to support the Council's objective of matching job growth to the future resident workforce. By being pitched between the Scenario 1 (86,333sqm) and Scenario 3 (280,758sqm) forecast, the selected Local Plan employment requirement is considered appropriate. Strategic Policy S8 provides additional flexibility for employment floorspace beyond the Local Plan requirement, creating potential headroom for windfall development and additional employment growth. The ELR also acknowledges that flexible employment allocations for E(g)/B2/B8 uses would help meet any future need for either office or industrial uses, therefore the figures require a degree of flexibility.

1.1.31 The employment requirement in the Local Plan is therefore justified by the evidence and reflects a level of provision that exceeds the minimum requirement identified by Scenario 1 while allowing flexibility for higher growth aspirations within Scenario 3.

1.1.32 The ELRs were prepared in line with the PPG methodology for determining future economic development needs. The evidence is therefore consistent with national policy and considered appropriate for establishing the council's Local Plan employment requirement.