HS025

Chelmsford Local Plan Examination in Public

Hearing Statement

on behalf of

Croudace Homes

Matter 3 – Strategic Priorities, Development Requirements and Spatial Principles

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October 2026 | AM-P Ref: 15024 | Representation IDs: AS-412 & AS-413

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INTRODUCTION

1. This Hearing Statement has been prepared by Andrew Martin – Planning Limited (AM-P) on behalf of Croudace Homes (Croudace).

2. Croudace controls all 16.7 hectares (ha) of land immediately to the north and east of Rettendon Place. This land is allocated in Strategic Growth Site (SGS) Policy 20 of the Chelmsford Focused Consultation Additional Sites (Regulation 19) Document (November 2025) (SD002) for a sustainable extension to the settlement comprising: around 350 new homes; small-scale retail provision; expansion of the existing primary school (0.36 ha); expansion of the existing or creation of a new early years and childcare nursery (0.11 ha); a multifunctional network of greenspace on-site including public open space, formal and informal sport, recreation and community space; vehicular access from Main Road; safe and convenient pedestrian and cycle connections; SuDS; and, financial contributions towards other community facilities.

3. This Hearing Statement supplements our formal representations from January 2026 (Representation IDs AS-412 & AS-413) and considers the Inspector's relevant Issues and Questions for Matter 3 of the Chelmsford Local Plan Examination.

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

The Council has set out in its answer to our Initial question on housing need, the reasons it has used to justify the housing requirement figure of 1,210 dwellings per annum (dpa). That justification is, in part, based around the transitional arrangements in the Framework. In February 2022, the Council declared a housing crisis in Chelmsford.

Q3.10 – Is the housing requirement of 1,210 dpa justified, evidence-based and consistent with national policy?

4. According to page 1 of the Council's Response to Inspector's Initial Questions (September 2026) (CC01), the housing requirement of 1,210 dwellings per annum (dpa) in Strategic Policy S6 of the Plan equates to 84% of the April 2026 local housing need figure (1,433 dpa) calculated using the latest Standard Method. This is significant because it exceeds the 80% threshold required in paragraph 234a of the 2024 version of the National Planning Policy Framework (NPPF) and therefore triggers the transitional arrangements which allow the Plan to be examined under the 2023 version of the NPPF.

5. CC01 also explains how a higher growth option of 1,406 dpa – which is very similar to the latest local housing need figure of 1,433 dpa – has been assessed in Section 6 of the Council's Integrated Impact Assessment (January 2025) (SD008) which found that this higher growth option performed less favourably than the proposed approach in the Plan. This was due to increased resource consumption, strategic highway constraints and greater uncertainty over delivery. As a result the Council concluded that the housing requirement of 1,210 dwellings was a more sustainable strategy when assessed against the reasonable alternatives.

6. Furthermore, the proposed housing supply at Table 2 of SD002 includes a total of 24,915 dwellings, i.e. an average of 1,311 dpa over the 19 year plan period. This is over 91% of the latest local housing need figure (1,433 dpa) and will support the Government's objective of significantly boosting the supply of homes and help to address the Council's declared housing crisis.

7. In summary Croudace considers that the housing requirement set out in the Plan is based on evidence and 'justified' given that it is an appropriate strategy taking into account the reasonable alternatives. It is also 'consistent with national policy' because it accords with the transitional provisions in both Annex A of the 2026 NPPF and Annex 1 of the 2024 NPPF, and enables the delivery of sustainable development in line with the 2023 NPPF which this Plan is being examined against.

Q3.12 – Are there any risks to the delivery of housing as a result of the supply buffer?

8. The housing supply presented in Table 2 of SD002 includes a total of 24,915 dwellings, which exceeds the minimum housing requirement (22,990 dwellings) in Strategic Policy S6 by 8.4% (1,925 dwellings). This is a much more substantial supply buffer than that previously set out in Table 1 of the Chelmsford Local Plan Pre-Submission (Regulation 19) Document (February 2025) (SD001) which identified a total supply of 23,326 dwellings (in Table 1) against the same minimum housing requirement (22,990 dwellings) and equated to a buffer of just 1.5% (336 dwellings).

9. The increased supply buffer provides greater flexibility and will enable the Plan to better handle changing circumstances during the plan period, for example, if housing delivery does not come forward as envisaged or unexpected delays are encountered on some sites.

10. With this in mind Croudace supports the latest housing supply and buffer set out in the Local Plan on the basis that they are 'justified' (an appropriate strategy, taking into account the reasonable alternatives), 'effective' (deliverable over the plan period) and 'consistent with national policy' (enabling the delivery of sustainable development), in accordance with paragraph 35 of the NPPF (2023).

MATTER 3 – ISSUE 4 – THE SPATIAL STRATEGY

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

Q3.17 – Is this approach justified, soundly based and consistent with national policy?

11. Croudace supports the proposed spatial strategy set out in the latest version of Strategic Policy S7. This is on the basis that it contains a more diversified approach to growth and incorporates a wider variety of large, medium and small growth sites, across more of the Key Service Settlements and

Service Settlements in the local authority area, than in earlier iterations of the Plan. This strengthens the proposed spatial strategy and housing supply, making them more robust, better able to handle delays or unforeseen issues and more likely to deliver a greater volume of new homes in the all-important first five years of the plan period.

12. There is only a finite amount of previously developed land in the Chelmsford Urban Area and this is clearly insufficient to address the Council's housing and employment requirements in their entirety. Sustainable urban extensions, new garden communities and the expansion of existing employment sites all have their own planning merits, but the overriding spatial strategy requires a combination of all three to ensure that the Plan is positively prepared (meets the areas objectively assessed needs), justified (an appropriate strategy, taking into account the reasonable alternatives), effective (deliverable over the plan period) and consistent with national policy (enables the delivery of sustainable development), in accordance with paragraph 35 of the NPPF (2023).

Q3.18 – 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?

13. As set out in our response to Question 3.12 above, the housing supply presented in Table 2 of SD002 includes a total of 24,915 dwellings, which exceeds the minimum housing requirement (22,990 dwellings) in Strategic Policy S6 by 8.4% (1,925 dwellings).

14. This is a much more substantial supply buffer than that previously incorporated in earlier iterations of the Plan. It also provides greater flexibility and will enable the Plan to better handle changing circumstances during the plan period, for example, if housing delivery does not come forward as envisaged or unexpected delays are encountered on some sites.

Q3.19 – What alternative approaches were tested in the preparation of the Plan?

15. The Council tested five spatial approaches at the Issues & Options stage in 2022, including growing the existing strategy, concentrating growth in urban areas, exploring a wider strategy, exploring growth along transport corridors and exploring a new settlement. These approaches were subsequently consolidated in 2023 and again in 2025 into three hybrid spatial strategies, namely: growing the existing strategy; exploring a new settlement and employment locations; and, exploring growth along transport corridors and in key service and service settlements. The preferred spatial strategy has evolved from the growing the existing strategy approach.

SUMMARY

16. Croudace supports the Local Plan's proposed housing requirement of 1,210 dwellings per annum, on the basis that it is an appropriate strategy, enables the delivery of sustainable development and is compliant with national policy. Although below the latest local housing need figure of 1,433 dwellings per annum, it exceeds the threshold required for the use of transitional arrangements in the NPPF and

is supported by evidence showing higher growth options perform less favourably in sustainability terms. The Plan incorporates a total supply 24,915 homes, creating an 8.4% buffer above minimum requirements and ensuring that there is flexibility and resilience in the supply.

17. Croudace also supports the Local Plan's spatial strategy, which combines previously developed land, sustainable urban extensions, new garden communities and the growth of service settlements, offering a diversified and deliverable approach to meeting housing needs.

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