Chelmsford Local Plan – Matter 3: Strategic Priorities, Development Requirements and Spatial Principles (ID: 1398045)

1. INTRODUCTION

1.1 This Hearing Statement has been prepared on behalf of This Land in response to Matter 3 (Strategic Priorities, Development Requirements and Spatial Principles) of the Chelmsford City Local Plan examination.

1.2 It responds to questions under Issue 2 (Spatial Principles), Issue 3 (Whether the Plan Makes Adequate Provision for Housing) and Issue 4 (Spatial Strategy).

1.3 This Land is promoting Land at Main Road, Boreham (CFS9/CFS59) for residential development. The Site is not allocated in the DLP. Representations were submitted at Regulation 19 and to the Focused Consultation Additional Sites Addendum seeking modifications to address identified soundness concerns.

1.4 The DLP will be examined against the applicable previous NPPF under the transitional arrangements. Unless stated otherwise, references to the NPPF are to that Framework.

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 Strategic Policy S1 and particularly Spatial Principles (a) and (e), which direct development towards well-connected, sustainable locations and higher-order settlements outside the Green Belt. However, these principles need to be more effectively reflected in the Spatial Strategy and distribution of housing growth.

2.2 Boreham is a Key Service Settlement with a good range of services, facilities and public transport connections, further enhanced by Beaulieu Park Station. Nevertheless, no new housing allocation is proposed at Boreham. This does not fully reflect the stated objective of focusing development towards higher-order settlements outside the Green Belt.

2.3 Land at Main Road (CFS9/CFS59) provides an opportunity to address this. The Site adjoins Boreham and CFS9 was assessed Green for suitability and achievability. Whilst availability was rated Yellow, our representations confirmed that the Site is within the promoter's control and subsequently confirmed full landowner support.

2.4 The Spatial Strategy should therefore give fuller effect to Policy S1 by directing proportionate housing growth towards Boreham and suitable opportunities such as Land at Main Road.

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. Strategic Policy S1 provides a clear and appropriate framework which prioritises well-connected and sustainable locations, focuses development towards higher-order settlements outside the Green Belt and recognises the settlement hierarchy.

2.6 Our concern is not with the Spatial Principles themselves, but their subsequent application. As explained in response to Question 3.3, Boreham's identification as a Key Service Settlement has not translated into any new housing allocation for Land at Main Road. The Plan should give fuller effect to Policy S1 through the Spatial Strategy and distribution of development.

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

2.7 Yes. Policy S1 provides an appropriate framework for considering additional development by directing growth towards sustainable locations and higher-order settlements outside the Green Belt.

2.8 Its effectiveness nevertheless depends upon its application through the Spatial Strategy and site-selection process. As explained above, Boreham is a Key Service Settlement yet receives no new housing allocation, notwithstanding the availability of opportunities such as Land at Main Road. Our concern therefore relates to the application of Policy S1 rather than the principles themselves.

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 greater reliance upon large strategic sites. As set out in our Regulation 19 representations, we have particular concerns regarding the Plan's reliance on large strategic allocations, including the lead-

in times and significant infrastructure requirements associated with such development. 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 Main Road, Boreham (CFS9/CFS59) illustrates this point. Boreham is identified as a Key Service Settlement but, notwithstanding that status, the Regulation 19 Plan proposes no new housing allocation at the settlement. Our Regulation 19 representations identify Boreham's range of services and facilities, public transport connections and the enhanced accessibility associated with Beaulieu Park Station and its transport hub, all of which reinforce its suitability to accommodate proportionate housing growth. CFS9 was assessed as Green in respect of suitability and achievability, with our representations explaining that the Yellow availability rating did not reflect the position because the land was within the promoter's control. Subsequent representations confirmed full landowner support for the promotion and allocation of the Site.

3.7 Our representations on the Regulation 19 Addendum also raise concerns regarding the approach taken through the IIA. In particular, Land at Main Road was not incorporated into either of the options assessed, despite representing a deliverable and sustainable opportunity, and the grouping of sites does not adequately consider whether individual sites could come forward independently. Our position is that a more robust appraisal should compare sites individually against the relevant sustainability objectives and assess larger sites both as standalone deliverable opportunities, where feasible, and as components of wider strategic growth.

3.8 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. Boreham illustrates the issue particularly clearly: it is identified as a Key Service Settlement, yet receives no new housing allocation. 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.

3.9 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 challenges and the availability of further sustainable 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 Boreham. Land at Main Road represents one such opportunity and would enable Boreham to make a proportionate contribution towards meeting Chelmsford's housing needs.

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

3.10 No. For the reasons given in response to Question 3.10, the implications identified through the IIA do not demonstrate that 1,210 dpa is the most appropriate requirement. The relevant question is whether those effects could be addressed through a different distribution and mix of sites.

3.11 A higher requirement need not depend upon additional strategic-scale development. Smaller and medium-sized sites at sustainable higher-order settlements could diversify supply. Land at Main Road demonstrates such an opportunity at Boreham, without the Plan necessarily increasing reliance upon further strategic development.

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

3.12 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.

3.13 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. Previous representations similarly identifies delays in strategic site delivery as a reason why additional sites are required and stresses the importance of a flexible and resilient supply.

3.14 A more diverse portfolio of sites would provide greater resilience. As set out in our Regulation 19 representations, significant reliance on large strategic allocations carries inherent delivery risks, including longer lead-in periods and substantial infrastructure requirements. Supplementing these allocations with smaller and medium-sized sites at sustainable higher-order settlements would diversify the sources and timing of housing delivery.

3.15 Land at Main Road, Boreham (CFS9/CFS59) provides such an opportunity. Boreham is identified as a Key Service Settlement, yet no new housing allocation is proposed at the settlement. CFS9 was assessed as Green in respect of suitability and achievability, and subsequent representations confirmed full landowner support for its promotion and allocation. Its allocation would therefore broaden the portfolio of housing sites and provide additional supply at a sustainable higher-order settlement.

3.16 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. This should include further sustainable and deliverable opportunities at higher-order settlements such as Boreham, rather than relying disproportionately upon the timely delivery of a relatively limited number of larger strategic sites.

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?

3.17 We are not aware of particular constraints preventing additional sites from being identified. The SHELAA already identifies further potential development opportunities.

3.18 Land at Main Road is one such opportunity. CFS9 was assessed Green for suitability and achievability, while our representations confirmed control of the Site and subsequent landowner support.

3.19 Rather than identifying further sites only after delivery problems arise, sufficient flexibility should be built into the Plan from the outset. A broader portfolio of deliverable sites at higher-order settlements such as Boreham would provide greater resilience against delay or non-delivery.

ISSUE 4 – THE SPATIAL STRATEGY

Strategic Policy S7

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

4.1 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.

4.2 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. As set out in our Regulation 19 representations, this creates significant reliance upon a relatively small number of strategic sites to maintain housing delivery across the Plan period.

4.3 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. Our Regulation 19 representations raised particular concerns regarding the lead-in times and infrastructure requirements associated with strategic-scale development, drawing upon the experience at North East Chelmsford Garden Community. A more diversified portfolio, incorporating additional smaller and medium-sized sites capable of contributing earlier in the Plan period, would therefore provide greater resilience.

4.4 This could be achieved consistently with Policy S7's own settlement hierarchy. The Policy identifies Boreham as a Key Service Settlement outside the Green Belt, whilst our Regulation 19 representations highlight the absence of any new housing allocation at Boreham notwithstanding its position within the settlement hierarchy. A more balanced strategy should therefore provide for proportionate housing growth at sustainable higher-order settlements such as Boreham alongside the SUEs and garden communities.

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?

4.5 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. This is not simply a theoretical concern: the Regulation 19 Addendum itself arose in circumstances where the Council identified slower than anticipated delivery or non-delivery of existing allocations and sought additional sites to address the resulting position.

4.6 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.

4.7 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 Main Road, Boreham (CFS9/CFS59) provides one such opportunity at a Key Service Settlement. In particular, CFS9 has been assessed as Green in respect of suitability and achievability, while subsequent representations have confirmed full landowner support for its promotion and allocation. Its allocation would provide an additional source of housing supply at a sustainable higher-order settlement and contribute towards a more diverse and resilient housing trajectory.

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

4.8 Alternative spatial approaches were considered through the IIA. However, our Addendum representations raise concern that these did not adequately test a genuinely diversified strategy combining strategic growth with a greater portfolio of smaller and medium-sized sites at sustainable higher-order settlements.

4.9 In particular, the Addendum IIA grouped sites into broader options rather than assessing all individual opportunities on their own merits. Land at Main Road was not incorporated into either option, and our representations questioned whether the methodology adequately considered the ability of individual sites to come forward independently.

4.10 A reasonable alternative would retain sustainable strategic allocations while supplementing them with deliverable sites at higher-order settlements. Land at Main Road illustrates that approach: additional housing adjoining the Key Service Settlement of Boreham, complementing rather than replacing strategic development and providing greater diversity within the housing trajectory.