HS073

HEARING STATEMENT

Chelmsford Local Plan

Matter 6:

Strategic Priorities, Development Requirements and Spatial Principles

On behalf of
Taylor Wimpey Strategic Land
(Respondent 1380218)

October 2026

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1. INTRODUCTION

1.1 This Hearing Statement is submitted on behalf of Taylor Wimpey Strategic Land (TWSL) and in respect of Matter 6 of the Matters, Issues and Questions of the Examination of the Chelmsford Local Plan.

1.2 This Hearing Statement considers Matter 6 Issue 1 (Site allocations); as well as the following specific proposed locations for growth:

- Location 11 – Bicknacre
- Location 14 – Ford End
- Location 17 – East Hannigfield
- Location 20 – Rettendon Place

1.3 The specific questions / sites addressed in this Statement are as follows:

- Q6.1: 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?
- Q6.6: Are the development requirements clear, and are any further safeguards or mitigation measures necessary to achieve an acceptable form of development?
- Q6.8: Are any modifications to the site policy needed for soundness?
- Growth Area 2, Growth Site 14b – Land south of Ford End Primary School, Ford End
- Growth Area 3, Strategic Growth Site 11c – Land west of Barbrook Way, Bicknacre
- Growth Area 3, Strategic Growth Site 17c Land South of Rough Hill Complex, East Hanningfield
- Growth Area 3, Strategic Growth Site 17d Land South and South East of East Hanningfield
- Growth Area 3, Growth Site 17e Land South of Windmill Farm, Back Lane, East Hanningfield
- Growth Area 3, Strategic Growth Site 20 Land to East and North of Rettendon Place

1.4 In respect of the specific allocations listed above, our concerns principally stem from the approach taken by the Council to them in the preparation of the Regulation 19 Addendum ('the Addendum)'.

1.5 TWSL is actively promoting the residential development of Land at Reeds Spring, Roxwell Road, Writtle, Chelmsford, identified through the Council's evidence base as 21SHELAA41 ('the Site'), including through representations on the Chelmsford Local Plan.

1.6 TWSL made representations on the Chelmsford Regulation 19 Local Plan ('the Regulation 19 DLP') consultation in March 2025 ('the Regulation 19 Representations'). Those comprised a site-specific representation concerning 21SHELAA41 and, together with Crest Nicholson and Dandara, a joint representation concerning the wider West Chelmsford growth option ('the Joint Representations').

1.7 TWSL subsequently made further representations to the consultation on the Regulation 19 Local Plan Addendum and its accompanying Integrated Impact Assessment ('the Addendum IIA) in January 2026 ('the Addendum Representations').

1.8 The DLP is being progressed under transitional arrangements, and having regard to the 2024 NPPF. Consequently, references to the NPPF in this response are to the 2024 NPPF, unless stated otherwise.

2. ISSUE 1 – SITE ALLOCATIONS

STRATEGIC POLICY S1

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 The new Local Plan's evidence base includes the Strategic Housing and Economic Land Availability Assessment (SHELAA) and Integrated Impact Assessment (IIA). IIA of both the Regulation 19 Local Plan were undertaken.

2.2 The SHELAA considered suitability, availability and achievability, and the IIA assessed the sustainability effects and spatial strategy alternatives.

2.3 Other topic evidence and infrastructure work were also relevant.

2.4 We do not object to the broad approach in terms of the scope of the evidence documents. The concerns relate to how the evidence has been used in decision making, and the transparency of this.

2.5 The SHELAA awards criterion scores and an overall RAG category, but the relationship between them is unclear as well as the decision as to whether or not to propose their allocation is unclear

2.6 For example, site 21SHELAA41 scored 100 and was rated as 'amber', whereas several sites with lower scores were rated 'yellow', i.e. some sites with lower scores in respect of suitability, availability and achievability than others were awarded a RAG rating suggesting they were more deliverable.

2.7 As noted in our Regulation 19 Representations, one site was identified which scored only 86, was rated 'amber', but is proposed to be allocated.

2.8 Site selection plainly involved additional judgement, yet that judgement is not recorded in a way that allows the decisive factors to be understood.

2.9 21SHELAA41 scored the maximum against 12 criteria: proximity to employment, impact on retail, public transport, rights of way and cycling, vehicle access, non-designated heritage, archaeology, minerals and waste, defined open space, Green Belt and Green Wedge, and air quality. It scored 4 out of 5 for access to the strategic road network. Those results do not sit comfortably with its rejection as an unsustainable location.

2.10 The lower scores were capable of mitigation or required a more nuanced interpretation. As demonstrated through submissions to the Council as part of the plan-making process, the developable layout of the Site can avoid fluvial and tidal flood risk; technical work demonstrated a lack of concerns in respect of gas-compressor noise and odour; the electricity transmission corridor was refined such that it is no longer a relevant constraint in respect of the Site; and new facilities and services being delivered as part of neighbouring committed developments was not accounted for in determining the Site's accessibility.

2.11 The IIA did not resolve these issues because it appraised the Site through wider packages, rather than the Site or its proposed development in its own right.

2.12 The original package, as assessed in the Regulation 19 DLP IIA, included Howe Green employment development.

2.13 The Regulation 19 Addendum IIA fails to consider that proposed development of the Site could come forward independently of a wider strategic development in this location and / or as a first phase of such development that would not result in long led-in times until the first delivery of homes.

2.14 A further difficulty arises from the manner in which the Site was assessed through the IIA. At both Regulation 19 DLP and Addendum stages, the Council largely considered 21SHELAA41 as part of wider packages or groupings of sites rather than as a standalone development opportunity. Consequently, the sustainability performance attributed to the Site appears to have been influenced by the characteristics of other land and development proposals within those packages.

2.15 At the Regulation 19 DLP stage, the principal spatial strategy option containing the Site also incorporated employment development at Howe Green. As explained in the Joint Representation, many of the reasons subsequently advanced for rejecting that option related to the employment element, including concerns regarding accessibility, strategic transport connections and landscape effects. Those considerations do not explain the rejection of a residential-led extension to West Chelmsford and do not represent a clear assessment of 21SHELAA41 on its own merits.

2.16 A similar issue arose through the Addendum process. The Addendum IIA compared broad packages of additional sites rather than undertaking a transparent comparison of individual development opportunities. As a result, strategic sites adjoining Chelmsford, including 21SHELAA41, were assessed alongside other larger proposals and then compared against a package of smaller village extensions. This approach obscures potentially significant differences in sustainability, accessibility, deliverability and infrastructure requirements between individual sites.

2.17 Consequently, it is difficult to identify whether the Council rejected 21SHELAA41 because of characteristics specific to the Site itself or because of wider assumptions associated with the package in which it was placed. A sound site-selection process should distinguish clearly between site-specific effects and package-level effects. The evidence does not presently demonstrate that this was done.

2.18 This is particularly important because 21SHELAA41 differs materially from many of the other sites grouped alongside it. It adjoins the Borough's principal settlement, forms a logical extension to an existing strategic growth location, has access to existing and planned services and infrastructure, and is capable of contributing within the first five years. Those attributes should have been assessed directly against the alternative sites ultimately selected through the Addendum process. The examination evidence does not currently provide a transparent comparison of that nature.

2.19 Accordingly, the issue is not simply that we disagree with the conclusions reached. Rather, the concern is that the evidence base does not clearly demonstrate why the specific sustainability and delivery characteristics of 21SHELAA41 were considered less favourable than those of the sites ultimately selected. In the absence of such analysis, it is difficult to conclude that the site-selection process was justified and therefore sound.

2.20 This is particularly a concern when one considers 21SHELAA41's allocation would clearly be consistent with the Local Plan's proposed spatial strategy yet has been rejected; whereas the sites proposed by the Addendum include a number that are clearly in less sustainable locations

Question 6.4 For the housing sites, what is the basis for the proposed capacity?

2.21 Capacity should arise from a site-specific assessment of developable area, constraints, density, green and blue infrastructure, access, community infrastructure and design quality. It should not be a residual number used to fill the supply requirement.

2.22 In the case of the Site, TWSL's capacity of approximately 800 homes is supported by a concept masterplan that also allows for education, sports facilities, a mobility hub, open space, biodiversity measures and active-travel links. This ensures that the quantum is not based on applying a gross density indiscriminately across the whole site.

2.23 The same standard should be applied to the additional allocations proposed by the Addendum. Where capacities have increased sharply, including from 20 to 250 homes at Bicknacre and from 20 to 75 at Ford End, the evidence should demonstrate the developable area, density, infrastructure consequences and effect on settlement form. New allocations at East Hanningfield and Rettendon Place should be considered cumulatively with existing commitments and proposed allocations.

2.24 If the supporting work was prepared after the proposed quantum was chosen, it is of particular importance for the evidence base to demonstrate that it genuinely tested rather than merely accommodated the figure.

Question 6.8 Are any modifications to the site policy needed for soundness

2.25 The Local Plan evidence does not presently demonstrate that the site-selection process was justified, for the reasons set out in response to Q6.1. The SHELAA should be updated to reflect the submitted evidence concerning the Site's constraints, mitigation, accessibility and deliverability. The IIA should assess 21SHELAA41 independently and as part of wider West Chelmsford growth, and should test a mixed strategy comprising selected village allocations alongside sustainable and deliverable edge-of-Chelmsford sites.

2.26 This work is required not simply to revise the evidence base, but to determine whether the submitted strategy remains justified. The Local Plan evidence does not explain why the Addendum allocations provide a more sustainable, effective or resilient response to housing delivery concerns than the available opportunities at West Chelmsford. Until the corrected assessment has been undertaken, it cannot be concluded that the submitted distribution represents an appropriate strategy when considered against the reasonable alternatives.

2.27 The Addendum process also appears to have proceeded on the basis that, once sufficient additional sites had been identified to address the immediate housing supply concerns, there was no need to consider other sustainable and deliverable opportunities. The housing requirement should not, however, be treated as a ceiling. The NPPF seeks to significantly boost the supply of homes. The relevant question is therefore not merely whether sufficient sites have been identified to meet the requirement, but whether the Plan contains an appropriate portfolio having regard to sustainability, deliverability, flexibility and resilience.

2.28 This is directly relevant to 21SHELAA41. The Site can provide approximately 800 homes, including affordable housing, adjoining Chelmsford, together with infrastructure, active-travel links, community facilities, green infrastructure and biodiversity enhancements. The Local Plan evidence does not demonstrate that its allocation would undermine the spatial strategy, prejudice infrastructure delivery or result in unacceptable environmental effects. Its exclusion cannot be justified solely because the housing requirement can be met through other allocations.

2.29 Correction of the SHELAA and IIA is likely to require Main Modifications. These may include allocation of 21SHELAA41, changes to the distribution of growth, amendments to Strategic Policy S7 and consequential changes to housing trajectories and site-allocation policies. The Plan must remain

capable of responding to the corrected evidence rather than treating the submitted distribution as fixed.

Word count: 1,574 words

3. GROWTH AREA 2

Growth Site 14b
Question w) Is the scale of development proposed consistent with the Spatial Principles and Spatial Strategy set out in Strategic Policies S1 and S7?

3.1 In the Regulation 19 DLP, Policy 14b proposed approximately 20 dwellings. The Addendum increased the allocation to 75 dwellings, representing a substantial relative increase in development at Ford End.

3.2 The concern is not with the principle of some development at Ford End, and it is recognised that proportionate growth may support village vitality. Rather, the concern is whether the Local Plan evidence justifies the significant increase having regard to the spatial strategy and sustainability objectives.

3.3 Ford End is a third-tier settlement within the hierarchy established by Strategic Policies S1 and S7. Although the spatial strategy supports proportionate growth across the Borough, its principal focus is Chelmsford and other higher-order settlements containing the greatest concentration of services, employment opportunities and public transport. The substantial uplift proposed through the Addendum must therefore be justified against that strategy.

3.4 The increase from 20 to 75 dwellings is not a minor refinement. It materially changes the role Ford End is expected to play in accommodating growth. However, the Local Plan evidence does not explain why this additional development should be directed to a small third-tier settlement rather than to opportunities within or adjoining Chelmsford, or how the increase accords with the objective of focusing growth on the Borough's most sustainable locations.

3.5 The proposed quantum has not been shown to be consistent with S1 and S7. Although proportionate growth in smaller settlements may support local services, the Local Plan evidence does not demonstrate why 75 dwellings should be directed to Ford End in preference to sustainable and deliverable opportunities adjoining Chelmsford.

3.6 Ford End has a limited range of facilities, limited public transport, no rail connection and relatively limited access to employment. Residents must travel elsewhere for many day-to-day needs. Additional growth is therefore more likely to generate longer journeys and greater reliance on the private car than development within or adjoining Chelmsford.

3.7 The issue is not whether Ford End can accommodate some growth, but whether the substantial increase represents an appropriate response to the housing delivery concerns that prompted the Addendum. The purpose of that exercise was to strengthen delivery and improve confidence in the housing trajectory. The Local Plan evidence does not explain why this objective is best achieved through increased growth at Ford End.

3.8 Nor is it clear why Ford End was preferred to 21SHELAA41 and other edge-of-Chelmsford opportunities, which relate directly to the principal settlement and accord more closely with S1 and S7. The concerns raised in the representations regarding the Addendum IIA's package-based assessment compound this lack of justification.

3.9 Accordingly, the Local Plan evidence does not demonstrate that the proposed quantum reflects Ford End's role within the settlement hierarchy or the wider spatial strategy. The allocation risks undermining the strategy's internal consistency by directing disproportionate additional growth to a materially less sustainable location than available opportunities adjoining Chelmsford.

Word count: 499 words

4. GROWTH AREA 3

Strategic Growth Site 11c

Question p) Are the essential site specific requirements and mitigation measures justified, and will they, along with other policies in the plan, be effective in achieving sustainable development on the sites?

4.1 Under the Regulation 19 DLP, SGS11c was proposed for approximately 20 dwellings. Through the Addendum process, the proposed capacity increased to approximately 250 dwellings. This substantial increase materially changes both the nature of the allocation and the scale of development proposed at Bicknacre. Consequently, the requirements necessary to ensure sustainable development must be considered in the context of the significantly larger scheme now proposed.

4.2 Our concern is not the principle of development at Bicknacre. Rather, it relates to whether the Local Plan evidence demonstrates that the mitigation package and policy requirements proposed for the enlarged allocation are sufficient to address the consequences of increasing the scale of development more than tenfold compared with that originally proposed.

4.3 The policy requirements should be capable of demonstrating that the enlarged allocation can function as a genuinely sustainable form of development. This includes consideration of transport, accessibility, public transport provision, active travel, education capacity, healthcare provision, wastewater and utilities infrastructure, biodiversity, flood risk, landscape impacts and community infrastructure.

4.4 However, the Local Plan evidence does not clearly demonstrate that these matters have been assessed in the context of the substantial increase in development proposed through the Addendum. Whilst the policy identifies a range of mitigation measures, it is not always clear whether they have been calibrated to a development of approximately 250 dwellings or whether they simply reflect requirements that would have arisen from the much smaller original Regulation 19 allocation.

4.5 More fundamentally, there is limited evidence demonstrating that the identified mitigation would overcome the sustainability concerns associated with directing substantially greater growth to Bicknacre. Mitigation may reduce individual impacts, but it does not necessarily remove wider concerns relating to accessibility, patterns of travel and the relationship between the scale of development proposed and the role of the settlement within the hierarchy

4.6 The effectiveness of the mitigation measures should also be considered relative to the alternatives available to the Council. The Local Plan evidence does not clearly explain why a substantial increase in growth at Bicknacre, requiring extensive mitigation and infrastructure interventions, represents a preferable solution to sustainable and deliverable opportunities adjoining Chelmsford. This raises questions not only regarding the effectiveness of the mitigation package but also whether the enlarged allocation forms part of an appropriate strategy overall.

Strategic Growth Sites / Growth Site 17a – 17e
Question s) Does the quantum of development accord with Strategic Policies S1 and S7?

4.7 The The Regulation 19 DLP proposed growth through Policies 17a and 17b. The Addendum added Policies 17c, 17d and 17e, materially increasing the cumulative quantum at East Hanningfield. The issue is therefore whether the overall level of growth, rather than each allocation viewed separately, accords with S1 and S7.

4.8 East Hanningfield is a small rural settlement with limited services, employment and public transport. The additional allocations would materially expand its role within the settlement hierarchy. However, the Local Plan evidence does not explain why this substantial cumulative growth is a more sustainable response to housing-delivery concerns than opportunities adjoining Chelmsford.

4.9 The Addendum IIA's package-based assessment compounds this concern because it does not provide a transparent comparison between East Hanningfield and 21SHELAA41. The evidence therefore does not presently demonstrate that the cumulative quantum at East Hanningfield accords with the focus of S1 and S7 on sustainable, accessible locations and the principal role of Chelmsford.

Strategic Growth Site 20
Question w) Does the quantum of development accord with Strategic Policies S1 and S7?

4.10 Rettendon Place is a small settlement with limited facilities, services and public transport. Residents rely on larger settlements for employment, education, healthcare, retail and other needs. It does not perform the strategic role assigned to Chelmsford or occupy an equivalent position within the settlement hierarchy.

4.11 S1 and S7 direct development towards the most sustainable and accessible locations, with Chelmsford as the principal focus. The Local Plan evidence does not explain why a new allocation of

350 dwellings at Rettendon Place provides a more sustainable or resilient response to housing-delivery concerns than directing growth to available sites within or adjoining Chelmsford.

4.12 As explained in response to Q6.1, the Addendum IIA compared packages rather than transparently comparing individual sites. It is therefore unclear why SGS20 was preferred to 21SHELAA41. Meeting the numerical housing requirement does not resolve that issue because the requirement is not a ceiling and the Plan must identify an appropriate portfolio of sustainable and deliverable sites.

4.13 The Local Plan evidence does not presently demonstrate that the quantum at SGS20 accords with S1 and S7. Correction of the site-selection evidence is likely to require Main Modifications, including reconsideration of the distribution of growth and the allocation of sustainable land at West Chelmsford.

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