HS026

Land at North West Chelmsford
Hearing Statement prepared on behalf of Dandara Eastern
October 2026

BIDWELLS

HEARING STATEMENT PREPARED ON BEHALF OF DANDARA EASTERN (REPRESENTATION NUMBER: 1326599)

MATTER 3

ISSUES 1, 2, 3 AND 4

Quality Assurance

Site name:	Land at North West Chelmsford
Client name:	Dandara Eastern
Type of report:	Hearing Statement
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1.0 Introduction

1.1 This Hearing Statement has been prepared by Bidwells on behalf of Dandara Eastern in support of Land at North West Chelmsford (hereafter "the site"). Dandara has promoted the site through each of the previous Local Plan consultation stages. They control the whole site demarked in the red line boundary plan contained in their Regulation 19 representations[1]. Part of the site was allocated as Strategic Growth Site 18a (SGS18a) for the delivery of 100 new homes in the Regulation 19 Additional Sites Focused Consultation Document.

1.2 The purpose of Dandara's involvement in the Examination is to demonstrate the deliverability of SGS18a and to highlight the availability of further development parcels that could come forward at North West Chelmsford in line with the Local Plan's Spatial Strategy to meet housing needs if required.

1.3 An addendum to the Vision Document submitted at the Regulation 19 Additional Sites stage is appended to our Hearing Statement on Matter 6 to show how further independent development parcels or phases could be allocated if required, supported by technical evidence.

1.4 This Hearing Statement responds to:

- Matter 3: Strategic Priorities, Development Requirements and Spatial Principles
  - Issue 1: Whether the Plan will be effective in addressing the Strategic Priorities for the climate, growth and place
    - Question 3.2
  - Issue 2: Spatial Principles (Strategic Policy S1)
    - Questions 3.3 and 3.6
  - Issue 3: Whether the Plan makes adequate provision for housing (Strategic Policy S6)
    - Questions 3.10, 3,11, 3,12 and 3.13
  - Issue 4: The Spatial Strategy (Strategic Policy S7)
    - Questions 3.18 and 3.19

[1] *Dandara Limited Regulation 19 Local Plan Representations (March 2025): Appendix 1, Figure 2, page 5*

2.0 Response to Matter 3, Issue 1

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?

2.1 The Focused Additional Sites consultation anticipated adoption in late 2026 or early 2027, resulting in a plan period of only around 14 to 15 years from adoption. It now appears extremely unlikely that the Plan will be adopted in 2026, meaning it is almost certain that the Plan will fall below the required 15-year period identified in national policy. The Council suggests this is acceptable because it is a transitional plan.

2.2 This position is a choice, not a necessity, due to the availability of additional sites in sustainable locations that could allocated now to deliver a further year of development to meet requirements. Doing so would also deliver a plan that is more resilient in the short to medium term.

2.3 In this context, the Examination should consider whether additional allocations are necessary now to facilitate a 15 year plan period and a resilient supply of deliverable and developable sites, consistent with paragraphs 61 and 72 of the 2024 NPPF. The wider North West Chelmsford masterplan provides an opportunity to strengthen the housing trajectory through the allocation of additional parcels of development that could come forward independently of SGS18a. The wider holding has an indicative overall capacity of approximately 991 dwellings across the short, medium and longer term.

3.0 Response to Matter 3, Issue 2

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

3.1 No, the proposed distribution of development does not make the most effective use of land which adjoins existing urban areas in the City Council's area.

3.2 North West Chelmsford adjoins the existing urban area and can utilise existing services, facilities and transport infrastructure serving Newlands Spring, Melbourne, West Chelmsford and in the City Centre. Phase 1 (allocated at SGS18a) can deliver approximately 160 new dwellings, without significant new infrastructure interventions. Further parcels are available for development that are not yet proposed for allocation, as explained more fully in our Statement on Matter 6.

3.3 Dandara maintains an objection to the justification for a new settlement to the East of Chelmsford (Hammonds Farm), taking account of the reasonable alternatives, including the allocation of further development on the edge of the urban area at North West Chelmsford. We refer the Council and the Inspector to objections made to the previous Regulation 19 Additional Sites consultation, which remain valid.

3.4 Dandara's concerns are exacerbated by the reliance of the Spatial Strategy on Junction 19 of the A12. This is a significant deliverability risk, due to the Government's decision to cancel planned improvements to the A12 that would have delivered required capacity. The Local Plan's traffic modelling concludes that the full improvements that were proposed to Junction 19 are required as a minimum to deliver the strategic growth expected by the Local Plan.

3.5 Furthermore, the evidence base supporting the draft Plan has not been sufficiently updated to justify the decision to allocate Hammonds Farm in favour of other options that are better connected to existing services. Whilst the Integrated Impact Assessment (IIA) assessed a range of strategic spatial growth options, it did not undertake a comparative assessment of whether additional growth at North West Chelmsford could provide a suitable alternative to Hammonds Farm.

3.6 The omission of further development allocations at North West Chelmsford is inconsistent with the objective of directing development towards sustainable locations, taking account of its location immediately adjoining the existing urban area. The evidence base does not clearly explain why such opportunities have been discounted in favour of Hammonds Farm.

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

3.7 No, the Plan does not provide sufficient flexibility. The Additional Sites consultation was prompted by the Council's inability to demonstrate a five-year housing land supply, with only 4.93 years identified at submission without further allocations. The additional small and medium-sized allocations made improve the position, but the Plan remains overly reliant on a limited number of large strategic sites and existing allocations that have not yet delivered. The reliance on large

sites presents risks to the housing trajectory if they are delayed, particularly in the context of the poor progress made with existing allocations.

Land at North West Chelmsford can help address this risk. SGS18a can come forward quickly to deliver around 160 new dwellings without substantial upfront infrastructure requirements. Further parcels of between 200 and 250 dwellings each are available in addition, if required, and most can come forward independently. Due to the site's location, none would require delivery of major new infrastructure, such as a new primary school. North West Chelmsford therefore presents a flexible source of additional housing supply on easily deliverable sites if required.

4.0 Response to Matter 3, Issue 3

Question 3.10: Is the housing requirement of 1,210 dpa justified, evidence-based and consistent with national policy?

4.1 The Council proposes a housing requirement of 1,210 dwellings per annum, representing a buffer of approximately 8% above the minimum requirement. This is significantly lower than the 20% buffer approach adopted in the current Local Plan and previously proposed through the earlier stages of the Local Plan review. The Council's own evidence demonstrates that housing delivery has historically fallen below expectations despite the existence of a larger buffer.

4.2 Given the acknowledged delays to strategic sites, Dandara remain concerned regarding the substantial contribution expected from Hammonds Farm, which is expected to deliver 3,000 new dwellings by 2041, some 13% of the total housing requirement. We do not believe that it is safe to rely on 3,000 new homes being delivered at Hammonds Farm during the Plan period. It is widely accepted that new settlements require substantial upfront infrastructure investment before they can deliver new housing, and Hammonds Farm is no exception. We presented extensive evidence on this subject in our Regulation 19 representations.

4.3 The supply of specific deliverable sites should include a buffer of 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply. Additional allocations could be made at North West Chelmsford to provide greater confidence that the housing requirement will be met.

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

4.4 No, the implications of the higher Standard Method figure reinforce the need for additional housing supply rather than a reduction in planned growth. The Additional Sites consultation acknowledged that Chelmsford’s housing requirement would be considerably higher if assessed against the full Standard Method figure and confirms that the Council already faces pressure from increasing housing need and housing delivery challenges.

4.5 In these circumstances, it is important that the Plan incorporates sufficient flexibility and resilience to respond to changing circumstances. This further supports the need for further allocations capable of contributing to housing supply during the early years of the Plan.

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

4.6 Yes, the proposed buffer of 8% provides limited flexibility should delivery of the large strategic allocations falter. The Council's own evidence demonstrates that the Additional Sites consultation was necessary because housing delivery projections had deteriorated to the point where a five-year housing land supply could no longer be demonstrated. Without the additional allocations, the Council estimated a supply of only 4.93 years.

4.7 This is a very different approach to that considered necessary for the adopted Local Plan, which allocated sufficient development to allow a 20% buffer over and above the minimum housing supply requirement that arose from the Framework's standard method at the time. Paragraph 6.7 of the adopted Local Plan explained the reasoning behind this:

> *"Using the full OAHN of 805 new homes per year, the total requirement is a minimum of 18,515 dwellings for the 23 years from 2013-2036. To provide flexibility in the supply of housing sites and help significantly boost its supply, the Council proposes to allocate development sites in the Local Plan to provide close to a further 20% supply buffer above the OAHN. The buffer allows for an additional housing supply in Chelmsford to be maintained throughout the Local Plan period. This same approach was implemented by the Council's previously adopted LDF covering the period 2001-2021"*

4.8 Despite allowing for this buffer, actual delivery has still fallen short of anticipated supply during the first 12 years of the adopted Local Plan's period. The Council's latest Housing Trajectory (April 2026) confirms that an average of 841 dwellings were completed during the period 2013/14 to 2025/26, approximately 11.5% below the 950 dwellings per annum that were planned for delivery during that period (taking an average of the 21,843 dwellings planned for delivery across the 2013-36 Plan period as a whole).

4.9 This performance was largely achieved during a period of strong market demand and substantial windfall from the conversion of redundant office blocks and other buildings following the expansion of permitted development rights in the early 2010's, in the context of a Plan that allowed a lower windfall allowance of 100 new homes per year.

4.10 It is also a different approach to that considered necessary at the Preferred Options draft stage, when enough sites were allocated to deliver a 20% buffer on top of the housing requirement. Paragraphs 6.6-6.9 of the Preferred Options Draft Plan explained the approach taken then:

> *"6.6 Since the Standard Method was first published by Government in 2018, the average housing need figure has been 953 homes per annum. To plan to meet only the minimum local housing need figure produced by the Standard Method would not significantly boost the supply of homes and potentially impacts on the Council's ability to meet housing needed by specific groups. The City Council declared a housing crisis in Chelmsford in February 2022 and levels of homelessness continue to rise. Taking this, and the annual variation into account, the Council proposes a Housing Requirement figure of 1,000 homes per annum for the plan period 2022– 2041…*
>
> *6.8 To provide flexibility in the supply of housing sites and help significantly boost its supply, the Council proposes to allocate development sites in the Local Plan to provide close to a further 20% supply buffer above the Housing Requirement of 1,000 homes per annum. The buffer allows for an additional housing supply in Chelmsford to be maintained throughout the Local Plan period to ensure the Housing Requirement is met. This same approach was implemented by the Council's in the Local Plan period covering 2013-2036.*
>
> *6.9 When taking the supply buffer into account, provision is made for a total of 22,567 new homes in the period 2022- 2041. When considering existing housing completions (822), existing sites with planning permission (3,745), existing Local Plan allocations to*

2036 (12,677) and Windfall Projection to 2041 (1,461), the residual new Local Plan Allocations for the period to 2041 is 3,862 new homes."

4.11 There are also significant risks associated with the reliance on Hammonds Farm. Major new settlements typically require substantial upfront infrastructure investment and long lead-in times. Dandara's Regulation 19 representations highlighted evidence regarding typical lead-in and build-out rates for developments of this scale and the historic underperformance of strategic allocations within Chelmsford.

4.12 Further allocations at North West Chelmsford could provide additional short and medium-term housing supply, helping to create a stronger buffer and reducing reliance on larger strategic sites and significantly improving the resilience of the housing trajectory.

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?

4.13 No, the Council has already demonstrated through the Additional Sites consultation that further allocations can be identified where necessary to improve housing supply and delivery.

4.14 There is no evidence to suggest that further suitable and deliverable sites could not be identified now to improve the resilience of the Plan. Additional land at North West Chelmsford provides a suitable opportunity. The land has been promoted throughout the Plan process, is controlled by a willing developer and could deliver up to an additional 832 dwellings (beyond SGS18a) in parcels or phases of between 200 and 250 homes (in round numbers), without relying on major infrastructure interventions.

4.15 Whilst further allocations could be added later via a focused review if strategic sites underperform, there is no reason to delay this process. Further allocations should be made now to supplement housing supply and improve the resilience of the Plan.

5.0 Response to Matter 3, Issue 4

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?

5.1 No, the need to undertake the Additional Sites consultation is evidence itself that additional flexibility was required to support delivery and maintain a five-year housing land supply.

5.2 The Plan remains heavily reliant on a limited number of strategic sites, particularly Hammonds Farm. Significant risks remain regarding infrastructure delivery, lead-in times and build-out rates. These risks are amplified by the cancellation of the A12 widening scheme and ongoing discussions regarding future improvements to Junction 19.

5.3 Greater resilience could be achieved by allocating additional sites capable of phased and independent delivery. Land at North West Chelmsford could deliver up to a further 832 dwellings, diversify the sources and timing of supply and provide contingency if larger strategic allocations underperform. The allocation of additional sites at Chelmsford North West would accord with paragraphs 61 and 72 of the 2024 NPPF, which require a sufficient amount, variety and mix of deliverable and developable sites to be provided.

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

5.4 The Issues and Options consultation tested five spatial options. Three included large-scale development at North West Chelmsford and a fourth included more limited growth in this location. Despite being included in four of the five options considered, North West Chelmsford was not carried forward at Preferred Options stage. Phase 1 was only subsequently allocated through the Additional Sites consultation in November 2025, for a modest scale of development.

5.5 The submitted strategy instead relies substantially on a limited number of large strategic allocations, such as Hammonds Farm. This introduces a clear delivery dependency due to the scale of the allocation and its reliance on additional capacity at Junction 19 of the A12. The Council's transport modelling identifies the previously proposed Junction 19 improvements as the minimum necessary to accommodate the strategic growth, notwithstanding the cancellation of the wider A12 improvement scheme.

5.6 North West Chelmsford was not adequately tested as a reasonable alternative at earlier stages of Plan making, but it remains a key opportunity now to reduce reliance on Hammonds Farm. Further parcels and phases of development are available and should be allocated now.

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