HS043

HEARING STATEMENT

Chelmsford Local Plan

Matter 3:

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) (respondent 1380218) and in respect of Matter 3 of the Matters, Issues and Questions of the Examination of the Chelmsford Local Plan.

1.2 This Hearing Statement considers the following Issues as set out in the Inspectors' Matters, Issues and Questions:

- Issue 2 – Spatial Principles
- Issue 3 – Whether the Plan makes adequate provision for housing
- Issue 4 – The Spatial Strategy

1.3 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').

1.4 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').

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

1.6 The Addendum Representations expressly stated that it should be read with the March 2025 representations, that the earlier points remained extant unless otherwise stated, and that the earlier soundness concerns continued to be relied upon. This Hearing Statement adopts the same approach. To avoid unnecessary duplication, references are made below to the relevant sections of the Regulation 19 Representations, the Joint Representations and the Addendum Representations, although the principal arguments are repeated where necessary to answer the Inspectors' questions directly.

1.7 The Site represents a logical extension to the existing West Chelmsford strategic growth location in the current Development Plan, at Warren Farm. It is suitable, available and achievable and can be delivered either as part of comprehensive westward growth or as a standalone allocation. Development could provide approximately 800 homes, including affordable housing and any

required specialist housing, together with education provision, a community sports facility, a park and ride or mobility hub, green infrastructure, habitat creation, biodiversity net gain and pedestrian and cycle connections.

1.8 The Site can contribute homes within the first five years following adoption. Its delivery does not depend upon every parcel within the wider West Chelmsford option being allocated or developed simultaneously. That distinction is central to TWSL's case because both the January 2025 IIA and November 2025 Addendum IIA assessed the Site principally through grouped strategic options rather than as the independently deliverable proposition promoted by TWSL.

1.9 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 2 – SPATIAL PRINCIPLES

STRATEGIC POLICY S1

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

3.1 The principles within S1 are broadly supported. They require development to be located in well-connected and sustainable locations, focus development at higher-order settlements, enhance Chelmsford City Centre and Urban Area, and ensure development is served by necessary infrastructure. Those principles are consistent with the thrust of national policy.

3.2 The soundness problem is the failure of S7 and the allocations to apply S1 consistently. The supporting text recognises that strategic development will be directed in or around Chelmsford City Centre and Urban Area and that needs cannot be met solely within existing boundaries. This is directly relevant to 21SHELAA41, which adjoins the established West Chelmsford growth location.

3.3 Chelmsford is the principal employment, service and public-transport centre. The Joint Representations explained the substantial differences between Chelmsford and South Woodham Ferrers and the still greater differences between Chelmsford and villages such as Ford End, East Hanningfield and Rettendon Place. When further housing had to be identified, faithful application of S1 required a strong focus on land in and around Chelmsford.

3.4 Instead, the Addendum directed major proportional growth to lower-tier settlements while rejecting a deliverable site adjoining the City. That is internally inconsistent and means that the policy principles are not effective in guiding the strategy.

3.5 Policy S1 should be retained but strengthened so that the principles demonstrably govern site selection, contingency supply and decisions on additional growth. Consequential changes to S7 and the allocations are required to ensure Policy S1 is effective.

Question 3.6 Does the policy provide flexibility through a range of site types and sizes?

3.6 The policy is not considered to provide sufficient flexibility.

3.7 The Plan relies heavily on SUEs and garden communities, while the Addendum's response was to add or expand a basket of rural sites. It misses a valuable middle category: substantial but

independently deliverable urban-edge sites capable of making an early and meaningful contribution without relying on the full infrastructure package of a new settlement.

3.8 The Regulation 19 Representations, Section 4, explained that over-reliance on sites exceeding 1,000 homes creates long lead-in risks associated with outline permission, reserved matters, infrastructure and the Council's multi-stage masterplanning process. The Addendum's emergence only months later confirms that those risks were not theoretical.

3.9 Allocation of 21SHELAA41 would diversify the portfolio by location, size, promoter and route to delivery. It can form part of comprehensive growth but does not require the whole wider option to proceed. Its allocation would materially improve flexibility.

Question 3.8 Will the policy be effective in meeting the needs of Chelmsford and accommodating unmet need from neighbouring authorities?

3.10 As presently proposed it is not considered that the policy will be effective in meeting the needs of Chelmsford.

3.11 Meeting needs requires establishing an adequate overall requirement, a realistic trajectory, and sufficient resilience planned into the strategy to account for the potential delay or non-delivery of individual sites. The Joint Representations, Section 2, explained the sensitivity of the transitional housing figure to updated dwelling stock and affordability data and argued for greater headroom.

3.12 The Addendum Representations supported the principle of identifying additional sites because adopted and proposed sites were not coming forward as expected. However, the need for an Addendum within months of Regulation 19 publication demonstrates that the portfolio was not sufficiently robust.

3.13 Allocation of the Site would provide approximately 880 homes, including affordable housing, in the principal settlement and would support education, sports, mobility and green-infrastructure benefits. These are direct contributions to Chelmsford's needs rather than growth justified only by village vitality.

3.14 Question 3.8 also refers to unmet need from neighbouring authorities. TWSL's principal case does not depend on a quantified unmet-needs figure. The point is that a strategy already shown to be vulnerable to delay has limited capacity to absorb any additional requirement that may properly arise. Nevertheless it is germane that administrative area of Chelmsford is surrounded by areas that are struggling to meet their own development needs. In particular, to the south and west are Green Belt authorities, many of which (including Brentwood and Basildon) are subject to significant

housing requirements. For example, Castle Point Borough Council's submitted Local Plan currently proposes to meet only c.53% of its housing requirements over the plan period, and a smaller proportion still in the short-term.

Question 3.9 Will the policy be effective in addressing identified additional housing needs?

3.15 The policy lacks a clear operative mechanism for additional needs. The settlement hierarchy is embedded in S7, but its decision-making role is uncertain. The Joint Representation suggested either moving it to the reasoned justification or making clear that it guides sustainable development within and adjoining settlements beyond the allocations.

3.16 The preferred response is to allocate sufficient sustainable sites now. Reliance on monitoring followed by a future review carries substantial delay and implementation risk. If a contingency mechanism is retained, it should include measurable triggers tied to housing delivery and five-year supply, and identify the sustainable sequence in which reserve capacity would be released.

3.17 Such a mechanism should prioritise well-connected sites adjoining higher-order settlements. It should not create an open-ended route to disproportionate growth in lower-tier villages.

Word count: 869 words

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

STRATEGIC POLICY S6: HOUSING REQUIREMENT AND SUPPLY

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

3.18 A buffer is only meaningful if it comprises sites with realistic trajectories and different risk profiles. A nominal surplus concentrated in strategic allocations subject to common infrastructure and approval risks gives rise to the concerns as to how effective this will be in responding to changing circumstances.

3.19 As noted in our Addendum Representations, several strategic sites were stalled or delayed, that other development would not proceed as quickly as anticipated and that the cancellation of the A12 widening scheme altered the context. These events arose within six months of Regulation 19 publication, while the Plan is intended to operate for at least 15 years from adoption.

3.20 The Joint Representations raised a separate risk: the minimum figure against which the transitional test operates may change with updated stock and affordability data. Even where the submitted requirement remains lawful under transitional arrangements, that reinforces the planning case for headroom rather than planning close to the minimum.

3.21 A buffer composed partly of 21SHELAA41 would be more robust because the Site can deliver independently and within the first five years. It would not remove all risk, but would reduce dependence on a limited number of complex allocations.

Question 3.13 Are there constraints to identifying additional sites if allocations do not come forward?

3.22 There are additional sites that are not proposed for allocation, but which are sustainable and deliverable for residential development.

3.23 The NPPF 2026, and Policy S5, specifically provides a policy route for unallocated sites in the event that they are required to bridge a gap between housing need and supply. However, reliance on such an approach would be unreasonable. Such an approach would lack certainty for decision-makers, the community, infrastructure providers, and promoters, developers and landowners.

3.24 Policy restrictions beyond settlement boundaries may also prevent prompt delivery if allocations fail. The sound response is to allocate additional sustainable sites now and provide an explicit reserve mechanism, rather than wait for under-delivery and begin a new search.

3.25 The appropriate approach would be to identify a greater number of sustainable and deliverable sites in the emerging Local Plan, and allocate these to imbue the strategy for meeting housing needs with sufficient flexibility.

3.26 The Regulation 19 Representation gave the example that 21SHELAA41 achieved a total SHELAA score of 100 and an amber rating but was not allocated, while CFS83 scored 84, was also amber and was allocated. Other sites with lower total scores received more favourable RAG ratings. We do not advocate mechanistic selection by score, but these inconsistencies demonstrate the potential for sites not currently proposed for allocation to be added to the portfolio of residential allocation in the Local Plan, thereby reducing the risk that needs will go unmet.

Word count: 478 words

4. ISSUE 4 – THE SPATIAL STRATEGY

STRATEGIC POLICY S7: SPATIAL STRATEGY
Question 3.17 Is this approach justified, soundly based and consistent with national policy?

4.1 The proposed approach is not considered fully justified.

4.2 The sequential emphasis on previously developed land, SUEs and garden communities can form part of a sound strategy, but it is not justified as an exclusive or near-exclusive model where reasonable urban-edge alternatives were not properly tested.

4.3 The NPPF requires plans to be positively prepared, justified, effective and consistent with national policy. It also seeks a significant boost to housing supply and recognises the role of a varied site portfolio. A strategy that rejects sustainable, deliverable housing land because it has been grouped with unrelated or more complex proposals is not based on proportionate evidence.

4.4 West Chelmsford is already accepted as a sustainable growth location. The Site adjoins that allocation and can connect to planned and existing infrastructure. The concept masterplan and transport evidence identify active-travel routes, bus opportunities and a mobility hub. The strategy does not explain why further growth here is less appropriate than substantial growth in less-connected villages.

4.5 The Regulation 19 Addendum allocation pattern is also inconsistent with the reason for its preparation. The identified problem was borough-wide delivery and five-year supply, not insufficient growth to sustain particular villages. Additional supply should therefore have been distributed according to S1 and comparative sustainability.

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?

4.6 The Plan's reliance on SUEs and garden communities creates exposure to lengthy masterplanning, infrastructure dependencies, multiple approvals, market absorption and changing transport programmes. The Regulation 19 Addendum responded to actual underperformance, but did not fully diversify those risks.

4.7 Small rural sites may deliver quickly, but the selected package also creates cumulative transport and infrastructure pressures and does not provide the scale of contribution available from an independently deliverable urban-edge site.

4.8 A resilient strategy should include large strategic sites, smaller sites and medium or larger urban-edge sites. It should spread delivery across different promoters and infrastructure packages and contain clear monitoring triggers. Allocation of 21SHELAA41 is a proportionate and immediately available way to achieve that.

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

4.9 The Regulation 19 Local Plan IIA tested six spatial strategy options.

4.10 The Addendum IIA tested Option 1, comprising additional small sites and increased capacities, against Option 2, comprising one or more strategic sites. Those exercises did not test the most obvious alternative: a mixed portfolio.

4.11 In the original Regulation 19 Local Plan IIA, West Chelmsford was linked to Howe Green employment growth, producing reasons for rejection that did not address the residential Site. At Addendum stage, 21SHELAA41 was assumed to be dependent upon a wider strategic option and therefore unable to contribute within five years. Both assumptions were incorrect.

4.12 The reasonable mixed alternative should combine the best-performing small sites with independently deliverable land adjoining Chelmsford, including 21SHELAA41, while retaining strategic sites whose trajectories are supported by evidence. That alternative requires appraisal before the submitted strategy can be considered justified.

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5. REMEDY

5.1 The issues highlighted in this Hearing Statement are considered capable of being addressed.

5.2 Suggested modifications include:

- Amend Policies S1 and S7 so the spatial principles and settlement hierarchy have a clear and effective role in allocations, decision-making and contingency supply.
- Revisit the housing supply buffer and trajectories after correcting the IIA and site-selection exercise, with a view to allocating additional sites for residential development.
- Include measurable monitoring and contingency triggers linked to strategic-site delivery and five-year supply.
- If the hierarchy remains in policy, distinguish clearly between Chelmsford and South Woodham Ferrers and recognise the City's materially greater capacity to accommodate sustainable growth.

Word count: 104 words