

# Chelmsford Local Plan

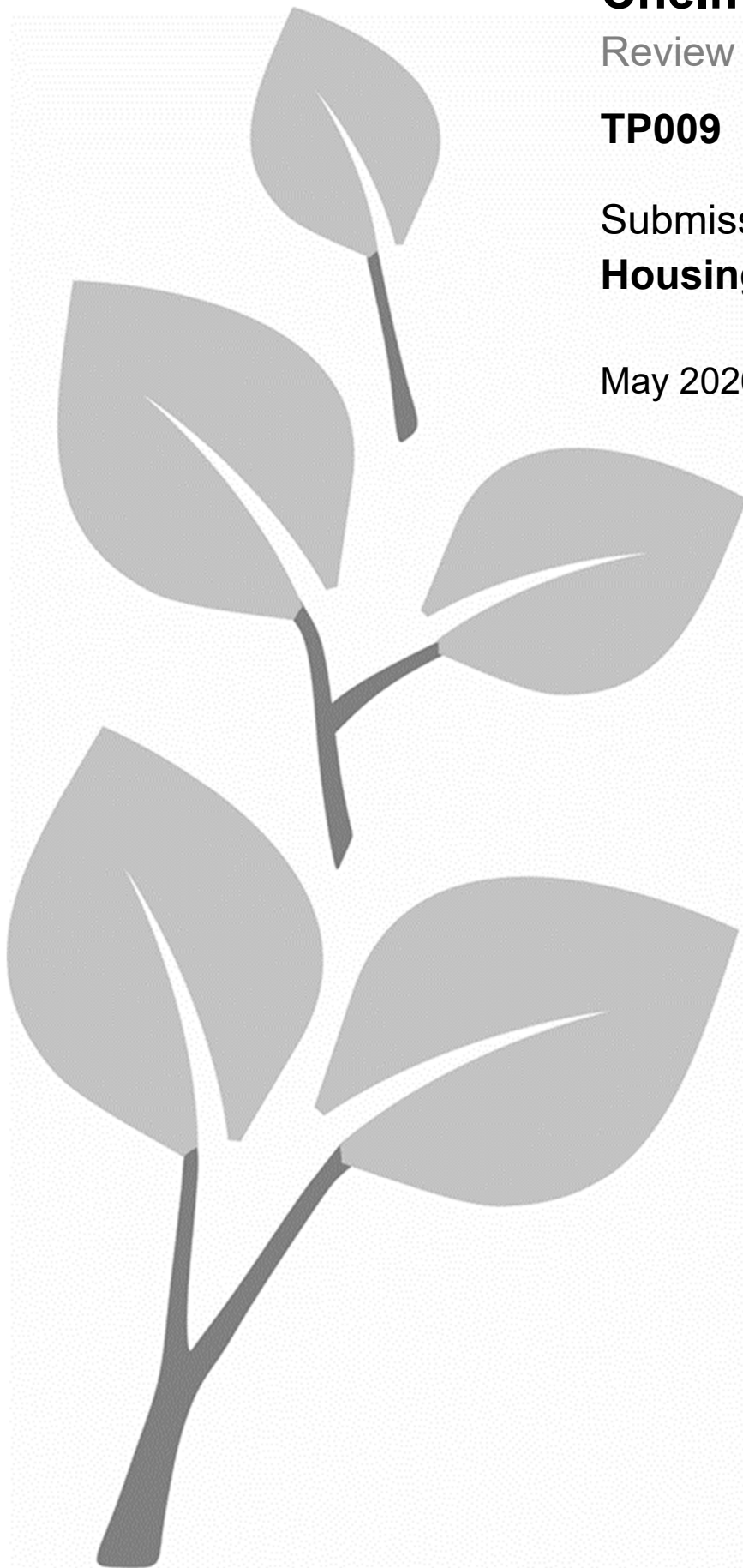
Review of the adopted Local Plan

**TP009**

Submission Topic Paper:

**Housing**

May 2026



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## 1. Purpose

- 1.1. This Topic Paper is one of a number produced by Chelmsford City Council (CCC) to provide background information and context of how the Local Plan has been formulated. This topic paper covers housing and how the Local Plan will provide sustainable patterns of development that meets the need for new homes, including accommodation for Travellers.
- 1.2. Topic papers have been refreshed and updated during the Local Plan Review process to ensure the latest information/position is available. This topic paper updates the Pre-Submission Housing Topic Paper ahead of submission following:
- An analysis of the Pre-Submission Local Plan consultation responses
  - Publication of the Focused Consultation Additional Sites Document and analysis of the consultation responses
  - Finalisation and updating of evidence base documents
  - Outcomes of ongoing cooperation and work to address any outstanding potential cross boundary impacts.
- 1.3. This Topic Paper also reflects suggested additional changes to the Local Plan as set out in the 'Schedule of Proposed Modifications, May 2026' ([SD005](#)). These changes do not affect the soundness of the Local Plan and are in response to comments made to the Pre-Submission Local Plan and Focused Consultation Additional Sites Document. They are also proposed to ensure that the submitted Local Plan reflects the latest position and is consistent.
- 1.4. The main issues covered by this Topic Paper are:
- Strategic Priority 5 - Meeting the Need for New homes; and Strategic Policy S6 – Housing and Employment requirements**, including:
- The minimum number of homes needed
  - The size, type and tenure of housing needed for different groups in the community
  - The achievability and effectiveness of existing housing policies in decision-making.
- Strategic Priority 4 – Ensuring sustainable patterns of development and protecting the Green Belt; and Strategic Policy S7 – The Spatial Strategy**, including:
- Housing supply
  - The mix of sites in the development plan
  - Maintaining supply and delivery through the development plan period.
- 1.5. The 2024 National Planning Policy Framework (NPPF) transitional arrangements require Local Plans to provide a minimum housing requirement of at least 80% of the revised Standard Method. Strategic Policy S6 makes provision for 22,990 homes overall or 1,210 net new dwellings per annum (dpa) which equates to 84% of the revised Standard Method which is 1,433 dwellings per annum as of April 2026.
- 1.6. This Topic Paper supersedes the Pre-Submission Housing Topic Paper published in February 2025, which included versions published at Issues and Options, and Preferred Options as Appendices.

## 2. Introduction

- 2.1. The review of the adopted Chelmsford Local Plan commenced in Winter 2021 and following consultations in 2022 and 2024, the Pre-Submission (Regulation 19) version was published for consultation in Spring 2025. A further focused stage of consultation on proposed additional sites to add to the Pre-Submission (Regulation 19) Local Plan ran from late November 2025 to early January 2026. This further consultation was undertaken to ensure sufficient land for new housing and employment development is identified particularly in the first 5 years of the plan's adoption.
- 2.2. The Local Plan submitted for examination comprises the Pre-Submission (Regulation 19) Consultation Document, February 2025 and the Focused Consultation Additional Sites (Regulation 19) Document, November 2025. If found sound following the examination, these documents will be incorporated together in a single new Local Plan before being finalised for adoption.

## 3. Background

- 3.1. The size of the local population and household formation rates affect demand for housing. Need for new housing arises when population growth leads to new households forming.
- 3.2. The local labour market affects a household's ability to access housing and affordability pressures can prevent people accessing the housing they need.
- 3.3. There is a backlog of need among people currently living in unsuitable accommodation. When people are unable to access suitable housing it can result in overcrowding, more young people living with their parents for longer, impaired labour mobility and increased levels of homelessness.

### **Population**

- 3.4. As of mid-2024, the population of Chelmsford is estimated to be 188,803 – an increase of around 16,675 people over the previous decade. This equates to a growth of 9.7% which is higher than the overall increase for England (7.8%) and a slightly higher rate of growth to that across Essex (8.8%) and the East of England (8.9%).
- 3.5. The table below shows the population in 2021 in each of the sub-areas listed – this is based on the 2021 Census and so totals differ very slightly from the mid-year estimate referenced above. The information shows around three-fifths of the population as living in the Urban area with the next largest area being Rural, with 32% of the population.

**Figure 1:** Population by sub-area 2021

	Population	% of population
<b>Urban</b>	107,205	<b>59.1%</b>
<b>Rural</b>	58,269	<b>32.1%</b>
<b>South Woodham Ferrers</b>	16,021	<b>8.8%</b>
Total	181,495	100%

Source: Census (2021)

- 3.6. In Chelmsford, the largest age group in the mid-2024 population estimates were people aged 16 – 64. Overall, the latest period shows the number of people aged 65+ increased by 17%. The data shows stronger growth in the number aged Under 16 than those aged 16-64.

**Figure 2:** Change in population by broad age group (2013 – 2023) Chelmsford

	2013	2024	Change	% change
<b>Under 16</b>	31,474	35,604	4,130	<b>13.1%</b>
<b>16 - 64</b>	107,972	116,865	8,893	<b>8.2%</b>
<b>65+</b>	31,035	36,334	5,299	<b>17.1%</b>
TOTAL	170,481	188,803	18,322	10.7%

Source: ONS Mid-year population estimates

### Number of households

- 3.7. Demographic changes also shape the type and size of accommodation needed. The 2022-based household projections indicated that the number of households in Chelmsford has increased by 4.4% since mid-2022, reaching 79,035 households in 2026. This compares to a projected increase in the East of England of 4.6% and a national increase of 4.7%.
- 3.8. The number of households recorded in the 2021 Census was 75,400 – close to the 2022 projection-based figure for 2022 (75,720).
- 3.9. The 2022-based household projections indicate that the household population in Chelmsford has increased at approximately the same rate as the number of households between 2022 and 2026, resulting in the average household size (people) remaining the same – 2.39 in 2022 and 2026. In comparison, at the national level the household population has risen at a slightly lower rate of 2.38 in the same period.
- 3.10. The most common household in 2022 was households with two or more adults (42.34%). This trend is set to continue into 2047, with two or more adult households forming 44.55% of households in Chelmsford.

### Income

- 3.11. Income has a significant effect on the level of choice a household has when seeking accommodation. The median earned gross income for full-time employees' resident in Chelmsford (individual incomes rather than household incomes) in 2024 was £39,812 according to the ONS Annual Survey of Hours and Earnings. This was marginally higher than the East of England regional figure of £39,098 and above the national median figure of £37,636. Since 2012, the median income of full-time employees' resident in Chelmsford has

increased by 22%. This increase is below the increase in the East of England (40%) and across England (40%).

### Housing Affordability

- 3.12. Figure 3 below shows the rise in median house prices in Chelmsford between 2012 – 2026. The rate of increase is far higher than the increase in the median income of full-time employees in Chelmsford across the same period, ranging between 56.7% for flats and 99.1% for detached dwellings.

**Figure 3:** Median House Price Change year ending December 2012 to year ending February 2026 by dwellings type – Chelmsford

	Year ending (£) December 2012	Year ending (£) Feb 2026	Change (£)	% Change
<b>Detached</b>	342,500	682,000	339,500	<b>99.1%</b>
<b>Semi-detached</b>	236,750	423,000	186,250	<b>78.7%</b>
<b>Terraced</b>	192,000	339,000	147,000	<b>76.6%</b>
<b>Flat</b>	134,000	210,000	76,000	56.7%

Source: ONS Small Area House Price Statistics

- 3.13. The ratio of median housing price to median gross annual workplace-based earnings in 2025 in Chelmsford was 10.74 compared to 8.21 in 2013. In 2025, the five-year average ratio for Chelmsford was 11.34 compared to 9.60 in the East of England and 7.47 for England.

### Deprivation

- 3.14. The English Index of Multiple Deprivation (IMD) measures relative levels of deprivation in small areas of England called Lower Layer Super Output Areas (LSOA). Deprivation refers to an unmet need, which is caused by a lack of resources including for areas such as income, employment, health, education, skills, training, crime, access to housing and services, and living environment.
- 3.15. In 2025, Chelmsford was ranked as one of the least deprived local authorities in England (266<sup>th</sup>), with one of the lowest average proportion of households in poverty within Essex. However, there are pockets of deprivation across Chelmsford, with four wards (Marconi, Moulsham and Central, St Andrews and Waterhouse Farm) having LSOA's that fall within the 20% most deprived areas nationally.

### Housing Supply

- 3.16. Residential land supply is a key contributing factor in housing affordability. The Ministry of Housing, Communities and Local Government (MHCLG) live tables indicate that there were 81,265 dwellings in Chelmsford in 2024.
- 3.17. Since 2013, there have been 10,938 net new dwellings built in Chelmsford. The average annual completion rate is 841 dwellings per annum, which is above the Housing Requirement in the adopted Local Plan (2020) of 805 per annum. Within this period, completions have exceeded 1,000 dwellings in four of the monitoring years. From the base

date of the adopted Local Plan (2013/2014), the Council has an oversupply of 473 dwellings as at the 31 March 2026.

- 3.18. The Housing Delivery Test 2023 measurement, published in December 2024 by the Ministry of Housing, Communities and Local Government, shows that Chelmsford exceeded the Housing Delivery Test Threshold by 16%.

## 4. Policy Context

- 4.1. All policies in the Local Plan must be positively prepared, justified, effective and consistent with national policy. The National Planning Policy Framework (NPPF) sets out the overarching planning policy framework, supported by the National Planning Practice Guidance (PPG).
- 4.2. The adopted Local Plan was examined under the 2012 NPPF. There have subsequently been updates to the NPPF and the Review of the Local Plan has been considered against the requirements of more recent national planning policy and guidance, including the December 2023 NPPF. Regard has also been had to the 2024 NPPF transitional arrangements that require Local Plans to provide a minimum housing requirement of at least 80% of the revised Standard Method figure for local housing need.
- 4.3. Further detail on these key changes for consideration is set out in the Figure 29, included under the section 'NPPF December 2023 Checklist'.

### National Policy Context

- 4.4. All relevant national planning policy and guidance have been considered in the Local Plan.

### Housing Need

- 4.5. The Government published a revised draft NPPF for consultation in July 2024 to replace the December 2023 version. The proposed revision included changes to the formula for the Standard Method producing a local housing need figure for Chelmsford of 1,406 new homes per annum. The consultation document stated that local authorities at Regulation 19 stage within one month of adoption of the new NPPF and proposing a housing requirement within 200 dwellings per annum of the local housing needs figure using the Standard Method in the proposed revised version, could be examined under the December 2023 NPPF.
- 4.6. The December 2024 NPPF amended the affordability multiplier again, producing a revised local housing need figure of 1,454 new homes per annum for Chelmsford. The December 2024 NPPF also contains transitional arrangements for plan-making, which state that the policies in the December 2024 version of the NPPF will apply except in prescribed circumstances. These include where a plan has reached Regulation 19 on or before the 12 March 2025 and the draft housing requirement is at least 80% of the new Standard Method calculation of local housing need. In such circumstances, the plan will be examined under the December 2023 NPPF.

- 4.7. Changes in the local housing need figure at key stages of the Local Plan review since the Standard Method was first introduced are summarised for information in Figure 4 below:

**Figure 4:** Local Housing Need (Standard Method) per annum in Chelmsford 2018-2026

April 2018	April 2019	April 2020	April 2021	April 2022	April 2023	April 2024	July-Sept 2024	Dec 2024	May 2025	April 2026
980	973	946	918	946	955	913	1,406	1,454	1,437	1,433

- 4.8. The NPPF is supported by Planning Practice Guidance (PPG) on a range of subjects. The most significant PPG documents relating to housing need and supply that have been updated since the publication of the Pre-Submission (Regulation 19) Consultation document are:
- [Green Belt \(27 February 2025\)](#)
  - [Housing and economic land availability assessment \(27 November 2025\)](#)
  - [Housing and economic needs assessment \(24 February 2025\)](#)
  - [Plan-making \(27 November 2025\)](#)
  - [Viability \(16 December 2025\)](#)
- 4.9. In addition, [Planning Policy for Traveller Sites](#), the Governments planning policy for traveller sites which should be read in conjunction with the NPPF, was revised on 12 December 2024.
- 4.10. All relevant changes to the PPG are considered, with key paragraph references included in the consultation text where relevant. However, consideration is also given to the fact that the Plan will be examined under the December 2023 NPPF.

## Local Policy Context

### Current Policy

- 4.11. In addition to changes in national planning policy, the review of the adopted Local Plan has considered the achievability and effectiveness of housing policies in decision making in the adopted Local Plan (2020), as well as new corporate priorities and strategies of the Council. This includes:
- Planning Advice Notes published and updated since 2020.
  - Policy implementation issues flagged through the latest published Authority Monitoring Report, in particular relating to Local Plan Policies DM1, DM2 and DM3.
- 4.12. The Council consulted on an updated draft Planning Obligations Supplementary Planning Document (SPD) alongside the Pre-Submission (Regulation 19) Local Plan Document. This SPD was revised to reflect changes to national planning policy guidance, proposed modifications to the Local Plan and new local strategies and policy guidance. It refers to the latest published Infrastructure Delivery Plan which sets out what infrastructure is required to support the Local Plan. Representations on the Draft Planning Obligations SPD were reviewed at Chelmsford Policy Board in January 2026 and modifications to the document

incorporated in the revised evidence base document ([INF011](#)) Chelmsford Local Plan Consultation Draft Planning Obligations Supplementary Planning Documents (January 2026). The Council intends to adopt this document in advance of the submission of the Local Plan.

## Co-operation with Key Stakeholders

- 4.13. The Council is committed to co-operating with other bodies on strategic planning matters. The Duty to Co-operate Strategy was reviewed and adopted in January 2022.
- 4.14. The Duty to Co-operate (DtC) was introduced through the Localism Act 2011, and until recently, was set out in the [2024 National Planning Policy Framework \(NPPF\)](#) (from Paragraph 24 of the 2024 version). However, this formal duty was removed with effect from 25 March 2026 following introduction of the [Levelling-up and Regeneration Act 2023 \(Commencement No. 11 and Saving and Transitional Provisions\) Regulations 2026](#).
- 4.15. The Council has made every effort to seek co-operation on cross-boundary and strategic planning matters in a focused, positive and structured way throughout the plan-making process. These discussions have helped to formulate the Local Plan, and we will continue to engage positively with key stakeholders as the Plan progresses through its examination and on its implementation once adopted. Evidence of engagement work carried out is set out in Statements of Common Ground and the Statement of Cooperation (SD004) (Available online via [Local Plan Review](#)).
- 4.16. The strategic matters for the Review of the Adopted Local Plan are identified as follows:
- Delivering homes for all including Gypsy and Traveller and Travelling Showpeople accommodation
  - Jobs and economy including green employment and regeneration
  - Retail, leisure, and cultural development
  - Sustainable transport, highways and active travel
  - Climate change action and mitigation including flood risk and zero carbon
  - Natural and historic environment including increased biodiversity and green/blue/wild spaces and connectivity of ecological networks
  - Community infrastructure including education, health and community facilities
  - Utility infrastructure including communications, waste, water and energy
  - London Stansted Airport future airspace redesign.
- 4.17. With regards to unmet housing need, a Mechanism for the Consideration of Unmet Housing Need ([AH005](#)) was developed and agreed by the Essex Planning Officers' Association (EPOA) in September 2017 for use across the Essex authorities. This sets out the methodology by which each local planning authority, together with their Housing Market Area (HMA) partners:
- i) should agree their full objectively assessed housing number, and
  - ii) if there is likely to be an unmet housing need because of constraints applicable to the area

of that authority, the process to follow to request an adjoining HMA to meet or contribute towards meeting the unmet need.

- 4.18. It is still important that Councils work with neighbouring authorities in the same HMA on strategic matters including housing and unmet need from neighbouring areas.
- 4.19. To date, none of the local authorities that are considered to share a HMA with Chelmsford (Braintree District Council, Colchester Borough Council, Maldon District Council and Tendring District Council) have indicated that they are unable to meet their housing need.
- 4.20. The following Councils wrote to Chelmsford City Council, making a formal request for assistance in meeting their unmet housing need:
- Basildon Borough Council – November 2024 (after Preferred Options consultation stage) and September 2025 (post Pre-Submission Regulation 19 consultation stage)
  - Castle Point Borough Council – at Issues and Options and Preferred Options consultation stages
  - Southend-on-Sea City Council – at Preferred Options stage, and at Regulation 18 Stage of its draft Local Plan.
- 4.21. All the above-mentioned authorities referenced Green Belt restrictions as constraints in meeting their housing needs and/or issues relating to increased housing need through the application of the revised Standard Method for calculating housing need.
- 4.22. Figure 4 above shows Chelmsford's local housing need increased by 59% from April 2024 – December 2024 using the Standard Method, resulting in Chelmsford having the highest annual need in Essex.
- 4.23. In order not to delay plan-making, the Council took the decision to progress its review of its Local Plan through the December 2024 NPPF transitional arrangements, requiring incorporation of most of the housing supply buffer identified at the Preferred Option stage to meet the revised housing requirement.
- 4.24. The Focused Consultation Additional Sites (Regulation 19) consultation was then subsequently undertaken in November 2025 – January 2026 to improve the Council's five-year housing land supply position at the point of adoption of the Local Plan.
- 4.25. Our Local Plan evidence base and Integrated Impact Assessment (IIA) have extensively tested our proposed Spatial Strategy to meet Chelmsford's development needs. As such there is no capacity in Chelmsford's proposed Spatial Strategy to accommodate any unmet housing need from neighbouring or nearby local authorities.
- 4.26. Neighbouring local authorities are at different stages of plan preparation and review. The NPPF (2024) states that meeting housing need could be an exceptional circumstance to trigger the review of Green Belt boundaries and propose alterations to the Green Belt to meet these needs in full. The concept of 'Grey Belt' has also been introduced which would need to be assessed. The South Essex Local Planning Authorities are all likely to be in the

same position in terms of Green Belt restrictions constraining their ability to meet their housing need, therefore it would make sense that a Green Belt review was undertaken strategically across the whole of South Essex and propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes of the remaining Green Belt.

- 4.27. Statements of Common Ground have been agreed with all neighbouring authorities where all agree that Chelmsford is unable to accommodate any need, including unmet need from other authorities.
- 4.28. A revised Gypsy and Traveller Accommodation Assessment for Essex has been undertaken to ensure that local planning authorities across Essex together with Southend-on-Sea and Thurrock councils work collaboratively to develop fair and effective strategies to meet the identified need for permanent and transit sites. Local Plans will then identify land for sites where appropriate.
- 4.29. Basildon District Council also formerly sought assistance with meeting their identified need for Gypsy and Traveller pitches and Travelling Showpeople plots, having been unable to identify suitable land in the urban area and through a bespoke Call for Sites exercise. Chelmsford City Council has also undertaken a bespoke Call for Sites for Gypsy and Traveller sites, explored all relevant SHELAA submissions for additional pitches and plots and reviewed the possibility of expansion/intensification of existing Travellers sites. However, it has not been possible to identify suitable and deliverable site allocations to meet the whole of the identified need for Chelmsford. The Local Plan includes a criteria-based policy to address the small shortfall within the Chelmsford City Council boundary. Consequently, there is no capacity to accommodate any unmet Gypsy and Traveller and Travelling Showpeople need from Basildon District Council.
- 4.30. The Essex Planning Officers' Association (EPOA) has agreed mechanisms for dealing with unmet housing and Gypsy and Traveller need, which provides a robust process and should be the starting point for such requests ([AH006](#)).

## Integrated Impact Assessment (IIA)

- 4.31. The Council has carried out an ongoing Integrated Impact Assessment (IIA) as the Local Plan has developed. The IIA assesses the following aspects of sustainable development:
- Sustainability Appraisal (SA)
  - Strategic Environmental Assessment (SEA)
  - Habitats Regulations Assessment (HRA)
  - Equality Impact Assessment (EqIA)
  - Health Impact Assessment (HIA)
- 4.32. The SA, SEA and HRA are a requirement of national policy. The HIA and EqIA are voluntary, but the Council believes they will help to provide a complete picture of the sustainability of the Review of the Local Plan.

## Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA)

4.33. The IIA identifies the key sustainability issues for the Review of the Local Plan, which feed into a framework of 14 objectives against which proposals are assessed. It covers the potential environmental, social, economic and health performance of the Local Plan and any reasonable alternatives. It has been used at each stage of the Review, and been subject to separate consultation, as follows:

- Scoping Report – Spring 2022
- Issues and Options – Summer/Autumn 2022
- Preferred Options – Spring 2024
- Pre-Submission – Spring 2025
- Additional Sites – Winter 2025

4.34. The key sustainability issues and Appraisal Framework Objectives relating to this Topic Paper are set out in Figure 5 below.

**Figure 5:** Appraisal Framework Extract

Appraisal Framework Objective	Key Sustainability Issue
<b>2. Housing:</b> To meet the housing needs of the Chelmsford City Area and deliver decent homes	Population
<b>3. Economy, Skills and Employment:</b> To achieve a strong and stable economy which offers rewarding and well located employment opportunities to everyone	Population
<b>4. Sustainable Living and Revitalisation:</b> To promote urban renaissance and support the vitality of rural centres, tackle deprivation and promote sustainable living	Population Human Health
<b>5. Health and Wellbeing:</b> To improve the health and well being of those living and working in the Chelmsford City area	Population Human Health

4.35. The main IIA report for the Local Plan is the Pre-Submission IIA (January 2025), which:

- provides baseline information for the key sustainability issues
- sets out the assessment framework and methodology
- contains the detailed assessment of the Local Plan requirements, allocations and policies
- sets out an assessment of alternatives
- reviews cumulative effects.

4.36. This was supplemented for the Additional Sites consultation by an IIA Addendum (November 2025), focusing on the proposed changes including the allocation of new and enlarged sites, and consequential amendments to Strategic Policies S6 and S7.

- 4.37. The two documents should be read together to provide full assessment outcomes for the Local Plan. However, it should be noted that in specific areas the figures quoted in the Pre-Submission IIA will have been superseded by those in the IIA Addendum, such as the increased requirements for housing and employment development.
- 4.38. Chapter 7 of the Pre-Submission IIA presents the appraisal of the cumulative effects of the Pre-Submission Local Plan. The appraisal (Table 7.1) highlights that the majority of the IIA objectives will experience positive effects as a result of the implementation of the policies and proposals contained in the Pre-Submission Local Plan.
- 4.39. Chapter 8 of the Pre-Submission IIA sets out significant positive effects of the Local Plan on housing, economy, health and well-being and townscape enhancement.
- 4.40. In terms of housing, development proposals are careful to ensure that homes, jobs and infrastructure are delivered in a co-ordinated fashion to help limit excess in or out commuting and ensure a degree of self-containment.
- 4.41. In terms of employment, the Local Plan will support economic growth across Chelmsford, delivering jobs and supporting regeneration and investment, with the potential to deliver benefits across a number of IIA objectives.
- 4.42. Mixed positive and negative effects are indicated for biodiversity, cultural heritage, flood risk, land use and resource use, with some uncertainty in respect of air quality and climate change. Water resource use is an issue, reflecting regional and local supply deficits. The negative (and uncertain) effects such as the permanent loss of greenfield land to development will need to be balanced with opportunities for green infrastructure provision and biodiversity enhancement. These likely effects have been considered in the Local Plan policies.
- 4.43. The IIA report acknowledges that the residential requirements and the more limited number of brownfield sites that have not already been earmarked for future development in the administrative area will mean that greenfield land is required for development.
- 4.44. Policies DM1-DM3 were assessed as having a significant positive impact on housing. The IIA determines that the implementation of Policies DM1 and DM2 will help ensure that there is a good balance and mix of housing provided through new housing development. These Policies were also assessed to have cumulative significant positive effects in respect of urban renaissance as the policies are considered likely to tackle inequalities and foster social inclusion by helping to meet housing needs of all communities, including the growing elderly population and the Gypsy, Traveller and Travelling Showpeople communities.
- 4.45. Policies DM1-DM3 were also assessed to have a cumulative minor positive effect on employment, health and wellbeing, transport, flood risk, air quality and climate change. No significant or minor negative effects were identified in respect of Policies DM1-DM3.
- 4.46. The following table summarises the IIA findings (Paragraph 8.8 of the Pre-Submission IIA) and the Council's response including how the IIA has informed the Local Plan:

**Figure 6:** Summary of IIA Findings

<b>IIA Recommendation</b>	<b>CCC Comment/Action</b>
<b>Consider fuller cross referencing to key development management policies</b>	Any application should comply with all relevant policies of the Local Plan
<b>Demonstrate how the spatial principles and policies will contribute to the declared climate and ecological emergency, focus on health and wellbeing, and secure the enhancement and extension of the City's Green Infrastructure Resource</b>	Text amended to incorporate this in Section 4 (Our Vision and Spatial Strategies) and Section 8 (Protecting and Securing Important Assets)
<b>Include reference to how the aspirations of Strategic Policy S14 Health and Wellbeing will be measured</b>	Covered within the Monitoring Framework, and in Section 5 (Creating Sustainable Development)
<b>Ensure that there is a direct link between Implementation of 10% Biodiversity Net Gain requirement and progress to responding to the biodiversity emergency</b>	Text amended to incorporate this in Strategic Policy S4
<b>Ensure that the long-term management of existing and new habitats is in place</b>	Covered within text relating to the Green Infrastructure Strategic Plan including Strategic Policy S1, and stewardship requirements for Garden Communities (Strategic Growth Site Policies 6 and 16a)
<b>A need to work collaboratively with partners to implement and monitor Policy DM31 Net Zero Carbon Development (In Operation)</b>	CCC is working collaboratively with ECC as implementation lead and other partners
<b>Identify measures to address the effects of inconsistent delivery on specific sites (especially on large extensions)</b>	Covered within the development trajectory and monitoring. Text amended for clarity in Section 6 (How will future development growth be accommodated?)
<b>Make reference to the aspiration for regeneration schemes to benefit existing residents</b>	This principle is central to Strategic Growth Site 1cc Andrews Place, and will be considered for other sites where applicable
<b>Suggest monitoring the degree of self-containment in large extensions so that residents and vulnerable groups are not disadvantaged in access to basic services</b>	Will be addressed through the masterplanning process and S106 agreements
<b>Address the requirements for site developers in respect of sustainable design and construction, including a Construction Environmental Management Plan (CEMP)</b>	Text amended to incorporate this in Section 9 (Making High Quality Places)
<b>Monitor the balance between housing and jobs provision to maintain a balance between in and out commuting, for long term sustainability</b>	Current allocations aim to achieve this balance
<b>Work with public and private sector partners to facilitate behavioural change in matters such as travel choices, attitudes to health and well-being, water use and recycling patterns.</b>	This is a focus for spatial planning, including engagement activity with partners, and having regard to external strategies and guidance, such as the Essex Design Guide (2018), Essex Local Transport Plan (2011) and its successor LTP4, Essex Coast Recreational Disturbance Avoidance and Mitigation Strategy 2018-2038, Chelmsford Surface Water Management Plan (2014), Make Space for Girls 2025-2028

4.47. The proposed additional sites have been assessed through the IIA Addendum, and the findings are presented in Appendix C of the Addendum, which have in-turn been informed by the RAG scores for the sites presented in Appendix D and the RAG scores presented in

Appendix M of the Pre-Submission IIA.

- 4.48. The IIA Addendum concludes that proposed new and expanded sites do not change the overall earlier assessment of cumulative effects in IIA terms, reflecting the fact that they are part of the existing spatial strategy. In addition, both individually and collectively, they are not of a scale to affect specific aspects of the plan (for example in respect of biodiversity or resource use).
- 4.49. The proposed amendments to Strategic Policies S6 and S7 are considered to be minor in nature (see Additional Sites (Regulation 19) Document) and reflect the need to adjust the approach to short-term housing delivery. Consequently, no changes to the assessment presented in the Pre-Submission IIA have been identified.

### Habitats Regulations Assessment (HRA)

- 4.50. Overall, the HRA has concluded that most aspects of the Local Plan will have no significant effects on any European sites, alone or in combination due to the absence of effect pathways.
- 4.51. Appropriate assessments have been undertaken for those aspects where effect pathways are present (in combination water quality, air quality and visitor pressure effects, and effects on species away from the sites), taking into account specific and cross-cutting policy-based mitigation and avoidance measures that have been incorporated into the plan. These appropriate assessments have employed additional analyses and data to resolve uncertainties present at the initial screening and have concluded that (as currently drafted) the Local Plan will have no adverse effects on the integrity of any European sites, alone or in combination.
- 4.52. The HRA Report Addendum (as part of the IIA) considered the proposed changes in the Additional Sites Document. The Addendum found that the proposed changes to the Local Plan do not affect the findings of the earlier HRA work and that the position remains that the Local Plan will not have adverse effects on any European sites either alone or in combination.

### Equality Impact Assessment (EqIA)

- 4.53. The EqIA results suggest that policies will help to secure development that will contribute to a range of positive effects across the topics considered in the EqIA (notably in relation to housing, service, employment and greenspace provision).
- 4.54. The proposed changes in the Additional Sites Consultation are not considered to require any changes to be made to the EqIA. This reflects the proposed continuation of the existing spatial strategy which was found to have beneficial effects in respect of EqIA, as well as the limited scale of the proposed allocations (comprising small scale site extensions and new sites) which neither individually nor together will influence the findings of these assessments.

## Health Impact Assessment (HIA)

- 4.55. The HIA results suggest that Local Plan policies will help to secure development that will contribute to a range of positive effects across the topics considered in the HIA.
- 4.56. The proposed changes in the Additional Sites Consultation are not considered to require any changes to be made to the HIA. This reflects the proposed continuation of the existing spatial strategy which was found to have beneficial effects in respect of HIA, as well as the limited scale of the proposed allocations (comprising small scale site extensions and new sites) which neither individually nor together will influence the findings of these assessments.

## Reasonable Alternatives

- 4.57. The Strategic Housing Needs Assessment (SHNA) published in August 2023 identified a need for 955 dwellings per annum (dpa) using the Standard Method at the time. It concluded that there were no exceptional circumstances to deviate from the Standard Method (either in an upward or downward direction).
- 4.58. 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 could potentially impact 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 in the Standard Method output into account, the Council proposed a Housing Requirement figure of 1,000 dpa for the plan period (2022 – 2041) in the Preferred Strategy.
- 4.59. Consultation on proposed reforms to the NPPF and planning system was published in September 2024. The proposed changes included implementing a new Standard Method and making it mandatory for local planning authorities to plan for the identified need. The housing need for Chelmsford City Council identified using the revised Standard Method, was 1,406 dpa. The revised NPPF set out proposed transitional arrangements for emerging Local Plans. It stated that there should be a gap of no more than 200 dwellings per annum between the local planning authority's revised housing need figure and its proposed housing requirement.
- 4.60. In response to the proposed changes, an addendum to the Council's 2023 SHNA report was published in November 2024. The addendum note was prepared as a partial update to the 2023 SHNA to assess the implications of moving from housing delivery using a Standard Method output of 955 dpa up to a revised figure of 1,206 dpa which was in line with the proposed transitional arrangements.
- 4.61. The SHNA (2023), including the 2024 addendum report, concluded that whilst there is no direct link between the affordable need and the overall housing need, the need for affordable housing is notable across the Council area and the amount of affordable housing delivered will be limited to the amount that can viably be provided.

- 4.62. Following consultation, the revised NPPF and Standard Method was published in December 2024. The transitional arrangements were amended to state that to proceed under the existing plan system, local plans need to meet at least 80% of the revised Standard Method for calculating housing need. Further to this, the revised Standard Method figure for Chelmsford increased from 1,406 dpa to 1,454 dpa.
- 4.63. Based on these changes, the Pre-Submission IIA considered a range of reasonable alternative strategies and options, through the IIA process and through technical evidence base testing, before finalising the policies and sites in the Local Plan. This has included the assessment of different Spatial Strategy options, higher and lower growth requirements, and different housing and employment development sites.
- 4.64. The IIA considers alternatives for the level of housing growth:
- 4.64.1. Lower growth (approx. 955 dpa or 18,145 total dwellings) based on the SHNA published in 2023 and previous Standard Method.
  - 4.64.2. Transitional growth (approx. 1,210 dpa or 22,990 total dwellings) based on the housing need identified through the revised Standard Method and transitional arrangements.
  - 4.64.3. Higher growth (approx. 1,406 dpa or 26,714 total dwellings) based on the housing need identified through the revised Standard Method published for consultation in July 2024.
- 4.65. The IIA acknowledges that the lower growth alternative is not in line with the revised NPPF, and it could be argued this is not a reasonable alternative but included this scenario as several representations were received from the public on the Preferred Strategy questioning the level of growth proposed in the plan.
- 4.66. In trying to establish reasonable alternatives for the Plan, the IIA explored the land available for development during the plan period. Further details on this are set out in the Spatial Strategy and Strategic Sites Topic Paper. For the transitional and higher growth levels, additional options over and above the existing Local Plan allocations are required to meet residual residential needs. Alternative site options which are situated within the Green Belt and Green Wedge were not included in any of the alternative spatial options to help meet any residual housing needs because there are sufficient and suitable site options outside of these designations.
- 4.67. The analysis of the reasonable alternatives in the IIA demonstrates that overall, the alternatives perform no better, and in many instances worse, than the proposed Spatial Strategy. The lower growth option performed poorly in meeting housing need and were also likely to have a negative effect on employment, reflecting restrictions on employment growth and the generation of out-commuting as residents seek employment opportunities elsewhere. The higher growth option performed more poorly overall reflecting greater resource use with greater uncertainty overall such as potential oversupply of housing in the plan period disrupting co-ordinated delivery against identified need.

- 4.68. The IIA recommends monitoring the balance between housing and jobs provision to help maintain a balance between in- and out-commuting to the City area, and consequently the aspiration for long-term sustainability in terms of a reasonable degree of self-containment. The current figures allocate land to provide a balance of jobs and homes. Monitoring of this will take place through the housing and employment monitoring mechanisms in the Monitoring Framework of the Plan.
- 4.69. Following the conclusion of the Pre-Submission Regulation 19 Local Plan consultation in February-March 2025, several significant events took place, these being:
- Three strategic sites in the Pre-Submission Local Plan, which were expected to contribute to housing delivery in the next five years, either stalled or been significantly delayed
  - The reassessment and re-profiling of the Council's housing land supply (August 2025) showed that other development sites will not be built as quickly as originally envisaged in the next five years
  - The adopted Local Plan became more than five years old on 27 May 2025, consequently the housing need figure is out of date which means for decision making on current planning applications the Council cannot demonstrate a five-year supply of deliverable housing
  - The Government announced the cancellation of the A12 Chelmsford to A120 widening scheme which had planning permission through a Development Consent Order (DCO).
- 4.70. At the Additional Sites consultation stage, due to the Council's position of not being able to demonstrate a five-year housing land supply, further options for meeting the residual need were assessed through the IIA Addendum.
- 4.71. The two options were to either allocate additional small sites and increase capacity at other identified allocations (Option 1); or to allocate an additional strategic site or sites to meet the shortfall (Option 2).
- 4.72. Option 1 was selected as the preferred approach as it aligned well with the Local Plan's strategic priorities, spatial principles and the settlement hierarchy; performed well in terms of housing, economy and employment; and deliverability of sites within the first five years of the Local Plan.
- 4.73. Option 2 was rejected due to not aligning with the Local Plan's strategic priorities, spatial principles and the settlement hierarchy; poorer performance in terms of housing, economy and employment; and uncertainties about deliverability within the first five years of the Local Plan.
- 4.74. Overall, the sustainability performance of the proposed additional sites, in light of their contribution to the Local Plan spatial strategy and mitigation proposed through specific site policies associated with each of them, was deemed as good as or better than sites rejected at Pre-Submission and Additional Sites stages.

## Evidence Base

- 4.75. In accordance with the requirements of the NPPF, policies and their requirements should be based on up-to-date evidence.
- 4.76. In addition to the IIA, the following documents set out in Figure 7 are of particular relevance to housing and support the Review of the Local Plan. Evidence base documents are available online via [Local Plan Review](#).

**Figure 7: Housing Related Evidence Base Documents**

Document	Summary
<p><b>Strategic Housing and Employment Land Availability Assessment:</b></p> <p>SHELA001: <a href="#">SHELAA 2026</a></p>	<p>The Strategic Housing and Employment Land Availability Assessment (SHELAA) is a study of sites promoted by landowners and developers that may have development potential. It includes several different documents that explain the methodology and assessment criteria used, as well as the summary outputs of each site. A SHELAA has been produced after each consultation stage of the Local Plan Review process to help inform the selection of new sites.</p>
<p><b>Infrastructure Delivery Plan:</b></p> <p>INF012: Chelmsford City Council IDP Stage 3 Report (March 2026) (Available online via <a href="#">Local Plan Review</a>)</p> <p><a href="#">INF005: Chelmsford City Council IDP Stage 2 Report (November 2024)</a></p> <p><a href="#">INF001: Infrastructure Delivery Plan Stage 1 Report (February 2024)</a></p>	<p>The IDP provides a high-level assessment of the infrastructure issues and requirements associated with the spatial strategy and proposed site allocations. An initial baseline report has been updated to include further analysis of the infrastructure required to support the preferred spatial strategy in the Local Plan.</p>
<p><b>Five Year Housing Land Supply:</b></p> <p>LDS011: Five Year Housing Land Supply Methodology (April 2026) (Available online via <a href="#">Local Plan Review</a>)</p> <p>LDS012: Five Year Housing Site Schedule (April 2026) (Available online via <a href="#">Local Plan Review</a>)</p>	<p>The Council publishes a practice note setting out how it calculates its five-year housing land supply in April each year. The Local Plan adopts the same approach using the proposed Housing Requirement figure of 1,210 dwellings per annum.</p> <p>The Five Year Housing Site Schedule lists the sites included in the Five Year Housing Land Supply calculation which includes</p>

Document	Summary
	sites allocated in the Chelmsford Local Plan 2013 – 2036 adopted in 2020, a windfall allowance and sites with planning permission as well as new/expanded sites proposed for allocated in the Pre-Submission (Regulation 19) Local Plan and Focused Consultation Additional Sites (Regulation 19) Document, updated as of April 2026.
<b>Housing Trajectory:</b>  LDS014: Housing Trajectory (April 2026) (Available online via <a href="#">Local Plan Review</a> )	Annual update of housing completions and forecast completions by growth area and tenures for the Local Plan period.
<b>Gypsy, Travellers and Travelling Showpersons Trajectory:</b>  LDS021: Gypsy, Travellers and Travelling Showpersons Trajectory (April 2026) (Available online via <a href="#">Local Plan Review</a> )	Annual update of pitches and plot completions and forecast completions by growth area for the Local Plan period.
<b>Windfall Assessment:</b>  LDS015: Windfall Assessment (April 2026) (Available online via <a href="#">Local Plan Review</a> )	A practice note setting out how the Council calculates the windfall allowance included in the Housing Trajectory and Five-Year Housing Land Supply.
<b>Strategic Housing Needs Assessment:</b>  <a href="#">AH004 Chelmsford Strategic Housing Needs Assessment Addendum (November 2024)</a>  <a href="#">AH001: Chelmsford Strategic Housing Needs Assessment</a>	An assessment of the overall need for housing which includes consideration of the Standard Method calculation of local housing needs as well as an assessment of the housing needs of specific groups. A partial update of the assessment was conducted to review the higher Housing Requirement figure introduced at the Regulation 19 consultation stage of the review process.
<b>Gypsy and Traveller Accommodation Assessment</b>  <a href="#">AH003 Chelmsford Gypsy and Traveller Accommodation Assessment (GTAA) 2024</a>	An assessment of the accommodation needs of Gypsy's and Travellers for the plan period 2023 – 2041.
<b>Authority Monitoring Report:</b>	The Authority Monitoring Report is published on an annual basis and monitors the production of the

<b>Document</b>	<b>Summary</b>
<p><a href="#">LDS019: Authority Monitoring Report (April 2024 – March 2025)</a></p> <p><a href="#">LDS002: Authority Monitoring Report (April 2023 – March 2024)</a></p> <p><a href="#">LDS020: Authority Monitoring Report (April 2022 – March 2023)</a></p>	<p>Council's Local Plan Documents against the Local Development Scheme, as well as the performance and effectiveness of the Council's planning policies in delivering the key objectives of the Local Plan.</p>
<p><b>PAS Toolkits:</b></p> <p><a href="#">OSP001 Toolkit Part 1 - Local Plan Review Assessment</a></p> <p>OSP011 Toolkit Part 2 - Submission Local Plan Form and Contents Checklist (Available online via <a href="#">Local Plan Review</a>)</p> <p>OSP012 Toolkit Part 3 - Submission Local Plan Process Requirements Checklist (Available online via <a href="#">Local Plan Review</a>)</p> <p>OSP013 Toolkit Part 4 - Submission Local Plan Soundness Quality Assessment (Available online via <a href="#">Local Plan Review</a>)</p>	<p>The Planning Advisory Service (PAS) produces a number of Toolkits to assist Local Authorities in the review of their Local Plans. This suite of documents have been considered through the preparation of the Local Plan to help understand which policies require updating against the 2023 NPPF, that the correct process has been followed in undertaking the review, and that the Plan being submitted for Examination is sound.</p>
<p><b>Chelmsford Local Plan Viability Assessment</b></p> <p><a href="#">V001 Chelmsford Local Plan Viability Update</a></p> <p><a href="#">V002 Chelmsford Local Plan Viability Update Note (November 2024)</a></p> <p>V003 Chelmsford Local Plan Viability Update Note (May 2026) (Available online via <a href="#">Local Plan Review</a>)</p>	<p>The viability work assesses the cumulative impact of policies on planned development. The assessments model various levels of policy requirements on several different typologies of development and have been updated through the preparation of the Local Plan to reflect latest available costs. They include sensitivity testing for changes in values and costs.</p>
<p><b>Integrated Impact Assessment</b></p> <p><a href="#">IIA001 Integrated Impact Assessment Scoping Report 2022</a></p> <p><a href="#">IIA002: Integrated Impact Assessment Issues and Options 2022</a></p> <p><a href="#">IIA004: Integrated Impact Assessment Feedback Report Issues and Options 2023</a></p> <p><a href="#">IIA005: Integrated Impact Assessment Preferred Options (May 2024)</a></p> <p><a href="#">IIA006: Integrated Impact Assessment Preferred Options Feedback Report 2024</a></p>	<p>The Integrated Impact Assessment (IIA) brings together a Sustainability Appraisal (SA), a Strategic Environmental Assessment (SEA), a Health Impact Assessment (HIA), an Equalities Impact Assessment (EqIA) and a Habitats Regulations Assessment (HRA) to assess the socio-economic and environmental effects of the Local Plan. The first stage involved consultation on a Scoping Report on the proposed approach to the assessment of the Local Plan. The Issues and Options, Preferred Options, Pre-Submission and Additional Sites stages of the</p>

Document	Summary
<p><a href="#">IIA007: Integrated Impact Assessment Pre-Submission 2024</a></p> <p><a href="#">IIA009: Integrated Impact Assessment Pre-Submission Feedback Report</a></p> <p><a href="#">IIA010: Integrated Impact Assessment (IIA): Focused Consultation Additional Sites (Regulation 19) Addendum</a></p> <p><a href="#">IIA012: Chelmsford HRA Addendum August 2025</a></p> <p><a href="#">IIA013: Integrated Impact Assessment: Additional Sites (Regulation 19) Addendum Feedback Report</a></p>	<p>Local Plan were accompanied by IIA Reports. The findings of the IIA Reports, together with consultation responses published in Feedback Reports, were used to help refine further Local Plan stages.</p>
<p><b>Regulation 22 Consultation Statement</b> SD003: Regulation 22 Consultation Statement (Available online via <a href="#">Local Plan Review</a>)</p>	<p>This statement details how the community and stakeholders were consulted during the process of preparing the Local Plan. For each consultation stage, it details who was consulted and when this happened, the main issues raised in the responses and how these have been considered.</p>

## Chelmsford Gypsy and Traveller Accommodation Assessment (GTAA) 2024

- 4.77. The [GTAA](#) provides an assessment of current and future need for Gypsy, Traveller and Travelling Showpeople accommodation in the Chelmsford City Council area for the period 2023 to 2041. Local authorities in Essex commissioned consultants ORS to complete individual assessments of need for permanent sites and a detailed Greater Essex Transit Study to determine the need for any transit provision across Essex. The Greater Essex Transit Study is ongoing at the time of drafting this Topic Paper.
- 4.78. Fieldwork for the GTAA was conducted between February and June 2023, with the study baseline set at October 2023. As a result, the findings reflect the definition of Gypsies and Travellers set out in Government's PPTS published in December 2023, which reintroduced within Annex 1 those persons who have ceased to travel permanently for specified reasons.

### Gypsy and Travellers

- 4.79. Overall, the pitch need for Gypsies and Travellers for the period 2023-2041 applying the 2023 PPTS definition is set out below in Figure 8. Needs are set out for those households that met the 2023 PPTS planning definition of a Gypsy or Traveller<sup>1</sup>; for any undetermined

<sup>1</sup> The [PPTS](#) planning definition was updated in December 2023 following the judgement in the Court of Appeal in the case of Smith V SSLUHC & Ors, to reintroduce those who have ceased to travel permanently.

households where an interview was not able to be completed due to households not being present despite up to three visits to each site; and for those households that did not meet the 2023 PPTS planning definition.

**Figure 8:** Pitch Need for Gypsies and Travellers 2023-2041

Status	2023 - 41
Meet Planning Definition	26
Undetermined	27
Do not meet Planning Definition	18
<b>TOTAL</b>	<b>71</b>

- 4.80. The GTAA recommends that the local proportion of those who met the planning definition (53% in Chelmsford) should be applied to the undetermined need when calculating the total number of households that are considered to meet the planning definition in the report conclusions (see Figure 9 below).
- 4.81. In general terms, it is a requirement of the NPPF (2023) that those households with a need for additional pitches that do not meet the 2023 PPTS planning definition have their need addressed through separate Local Plan Policies e.g. Policy DM1 C) ii).
- 4.82. Taking into consideration all of the elements of need that have been assessed, together with the assumptions on the proportion of undetermined households that are likely to meet the planning definition, the table below sets out the number of pitches that will need to be addressed through site expansions or new allocations (Meet the Planning Definition) and through other Local Plan Housing Policies (Do Not Meet Planning Definition).

**Figure 9** – Need for Gypsy and Traveller households broken down by Local Plan Policy Type – Local 53%.

Delivery Status	Gypsy and Traveller Policy				Housing Policy				TOTAL
	23-27	28-32	33-37	38-41	23-27	28-32	33-37	38-41	23-41
Meet Planning Definition	24	5	6	5	0	0	0	0	<b>40</b>
Do Not Meet Planning Definition	0	0	0	0	16	5	6	4	<b>31</b>
<b>TOTAL</b>	<b>24</b>	<b>5</b>	<b>6</b>	<b>5</b>	<b>16</b>	<b>5</b>	<b>6</b>	<b>4</b>	<b>71</b>

- 4.83. In December 2024, a revised PPTS was published alongside the new NPPF. This widened the definition of Gypsies and Travellers to include 'all other persons with a cultural tradition of nomadism or of living in a caravan'. The impact of the revised PPTS definition on the 2024 GTAA is set out in Figure 10 below. In sum, all travellers who were interviewed in the latest GTAA are now considered to require an allocated pitch (26 households that 'Meet the Planning Definition' plus 18 that 'Do not meet the Planning Definition' in Figure 8 above - 44 in total).

**Figure 10** – Need for Gypsy and Traveller households broken down by Local Plan Policy Type – 2024 PPTS Definition

Delivery Status	Gypsy and Traveller Policy				Housing Policy				TOTAL
	23-27	28-32	33-37	38-41	23-27	28-32	33-37	38-41	23-41
Meet Planning Definition	24	6	8	6	0	0	0	0	<b>44</b>
Undetermined	0	0	0	0	16	4	4	3	<b>27</b>
<b>TOTAL</b>	<b>24</b>	<b>6</b>	<b>8</b>	<b>6</b>	<b>16</b>	<b>4</b>	<b>4</b>	<b>3</b>	<b>71</b>

### Travelling Showpeople

- 4.84. Overall, the plot needs for Travelling Showpeople from 2023 to 2041 are set out in Figure 11 below. All the need is from households that met the planning definition.
- 4.85. Analysis of the household interviews indicated that there is a need arising from 8 unauthorised plots; 13 plots from concealed/doubled up/over-crowded households and single adults; 5 plots arising from a five-year need associated with teenage children; and 12 plots resulting from new household formation based on the household demographics.

**Figure 11** – Need for Travelling Showpeople households broken down by Local Plan Policy Type

Delivery Status	Gypsy and Traveller Policy				Housing Policy				TOTAL
	23-27	28-32	33-37	38-41	23-27	28-32	33-37	38-41	23-41
Meet Planning Definition	26	7	3	2	0	0	0	0	<b>38</b>
Do Not Meet Planning Definition	0	0	0	0	0	0	0	0	<b>0</b>
<b>TOTAL</b>	<b>26</b>	<b>7</b>	<b>3</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>38</b>

- 4.86. The revised PPTS published in 2024 does not affect the assessment of need for Travelling Showpeople plots, as all households were assessed as meeting the 2023 PPTS definition. However, at the time of the GTAA baseline, only 8 plots from an unauthorised yard in Chelmsford were considered in the assessment as there was a Stop Notice in place preventing the occupation of the remaining 3. The potential residents of the unoccupied plots were not considered in the GTAA as they were not resident in the administrative area of Chelmsford. Subsequently, the yard was granted a temporary planning permission on appeal for a total of 11 plots. Taking account of the current need arising from the undeveloped plots, the revised current need for additional plots is judged to have increased by 3 plots within the first five years. The revised estimate of need for Travelling Showpeople plots is shown in Figure 12 below.

**Figure 12 – Revised Need for Travelling Showpeople households broken down by Local Plan Policy Type**

Delivery Status	Gypsy and Traveller Policy				Housing Policy				TOTAL
	23-27	28-32	33-37	38-41	23-27	28-32	33-37	38-41	
Meet Planning Definition	29	7	3	2	0	0	0	0	41
Do Not Meet Planning Definition	0	0	0	0	0	0	0	0	0
<b>TOTAL</b>	<b>29</b>	<b>7</b>	<b>3</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>41</b>

### Local Plan Viability Update Note (April 2026)

- 4.87. HDH Planning & Development Ltd (HDH), produced the Chelmsford City Council Local Plan Viability Update (August 2023 Viability Update) and the Chelmsford City Council Regulation 19 Viability Note (November 2024 Viability Note). The August 2023 Viability Update built on (and replaced) the Council's existing viability work, specifically the Chelmsford City Council Local Plan Viability Study, including CIL Viability Review by HDH (January 2018 Viability Study).
- 4.88. The November 2024 Viability Note considered how changes to national policy and to the main inputs underpinning the August 2023 Viability Update impacted on viability.
- 4.89. A Local Plan Viability Update 2026 Further Update Note by HDH (2026 Viability Update Note) considers how changes in national policy, in the Local Plan, and changes to and in the main inputs (costs and values) may impact on viability and whether it is necessary for the Council to fully update the viability evidence before submitting the Local Plan for examination.
- 4.90. The analysis shows that viability has worsened since 2023 and 2024, with the Residual Values being less. In terms of costs, the main changes are the BCIS based build cost increase, the increase in circulation space assumptions for flatted development, and the application of the Building Safety Levy. It is only for housing development in the wider Chelmsford area where this has been offset, in part, by increases in sales prices. Whilst the Residual values are less, the pattern of results is broadly similar, with the greenfield sites mostly being viable and the brownfield sites not being viable.
- 4.91. The 2026 Viability Update Note provides a broad and proportionate update to the Council's earlier viability work, having regard to changes in market conditions, revisions to national policy and updates to the Local Plan. The results are broadly similar to those presented in the August 2023 Viability Update and November 2024 Viability Note. Having applied the specified adjustments, and updated the full policy-on appraisals, the 2026 Viability Update concludes that the Council can continue to rely on the existing viability evidence.

## Consultation Feedback

4.92. The Review of the Local Plan has been prepared following four public consultations - Issues and Options in 2022, Preferred Options in 2024, Pre-Submission in 2025 and Additional Sites in 2025. Full details of engagement that has taken place and a summary of the main issues raised in the responses and Council response is set out in the Regulation 22 Consultation Statement (SD003) available online via [Local Plan Review](#). The main housing related issues raised in responses to the four consultations include:

- Support for the use of the Standard Method but representations both supporting and disputing the amount, need and justification for any additional housing above this output
- Many in the development industry call for an immediate/earlier review of the plan to meet housing needs in full as soon as possible
- Representations to increase the Housing Requirement to meet specific housing needs
- Many developers challenge the delivery rates of strategic site allocations in particular SGS16a, and whether a five-year housing land supply can be achieved and maintained
- On submission/ adoption, the Council will be unable to demonstrate a five-year housing land supply, and the new Plan will require immediate review
- Support for the housing supply buffer as well as representations querying the justification for a supply buffer in addition to a Housing Requirement buffer
- Need to allocate more sites that could deliver more quickly
- Over-reliance on windfall delivery (10% of supply)
- Over-reliance on one large allocation to deliver a substantial proportion of the housing requirement
- Windfall allowance calculation is incorrect because the new sites that have been identified should be deducted from the total windfall figure
- Representations stating that exception site developments aren't a good idea but others suggesting they should be applied in more rural areas
- Support for 10% of the housing requirement being on small sites
- Concerns there are not enough small site housing allocations which does not accord with national policy requirements
- Plan should allocate additional small/ medium scale sites to ensure consistency with the NPPF
- Support for a higher affordable housing requirement if viable
- Support for specialist residential accommodation allocations for older people and other specific housing needs where evidenced
- Specialist Residential Accommodation requirement is too generic and low and there is a need to specifically allocate homes for older persons
- Some developers disagreeing with the requirement for 100% of new dwellings to be accessible and adaptable based on cost, not justified and not required nationally
- Representations for greater flexibility in the housing market mix.
- Concerns over lack of evidence for and delivery of the Gypsy and Travellers and Travelling Showpeople requirements

- Opposition from the development industry to some new policies and/or requirements including housing policies DM1 and DM2
- Give more support and priority to build to rent
- Plan does not address issues of unaffordability or homelessness
- Self-build homes should be encouraged rather than required by evidence of local need and their impact considered on development viability
- Calls to allow viability assessments at applications stage.

4.93. The 'You Said We Did' Feedback Reports provide more details and are available via [www.chelmsford.gov.uk/lp-review](http://www.chelmsford.gov.uk/lp-review).

## Local Plan Approach

### Housing Need

#### Housing Requirement

- 4.94. The Local Plan proposes a housing requirement of 1,210 new homes per annum (22,990 across the plan period) which equates to 84% of the April 2026 local housing need figure of 1,433 calculated using the latest Standard Method, enabling the Council to be examined under the December 2023 NPPF.
- 4.95. A lower growth rate of 955 new homes per annum (18,145 across the plan period) was dismissed as it would not be in line with the NPPF. In addition, a lower growth option performs poorly in meeting housing need and is also likely to have a negative effect on employment, reflecting restrictions on employment growth and the generation of out-commuting, as residents seek employment opportunities elsewhere.
- 4.96. A higher growth option of 1,406 new homes per annum (26,714 across the plan period) was also assessed in the IIA but performed more poorly overall reflecting greater resource use with greater uncertainty overall such as potential oversupply of housing in the plan period, disrupting co-ordinated delivery against identified need.
- 4.97. The adopted Local Plan has a Housing Requirement figure of 805 net new homes per annum and from the base date of the adopted Local Plan (2013/2014), the Council has an oversupply of 463 dwellings as at the 31 March 2026. For four years since 2013, housing delivery has exceeded 1,000 new net homes per annum. The Housing Delivery Test 2023 measurement shows that Chelmsford exceeded the Test threshold by 16%. The Council can therefore demonstrate that its Plan-lead approach has a record of delivering new housing above the Housing Requirement set out in the adopted Plan.
- 4.98. The Employment Land Review Focused Update (December 2024) sets out that the Council can still meet labour demand, with flexible site allocations. The IIA recommends monitoring the balance between housing and jobs provision to maintain a balance between in- and out-commuting to the City area, and consequently the aspiration for long-term sustainability in terms of a reasonable degree of self-containment. The Focused Consultation Additional Sites (Regulation 19) consultation incorporates additional new employment floorspace to accommodate economic growth and employment requirements to help meet the new

labour supply associated with the significant increase in Chelmsford's housing requirement. Further details on this are set out in the Employment Topic Paper.

- 4.99. The Council is at an advanced stage of reviewing its adopted Local Plan and to meet the local housing need using the Standard Method in full (1,433 net new homes per annum or an additional 4,237 homes across the plan period following the December 2024 NPPF) would require significant delays and extra costs to the Council and would not be supported by the current evidence base.
- 4.100. The Council has reviewed the implications of moving to a Housing Requirement figure of 1,210 through updates to its SHNA, Employment Land Review Focused Update (December 2024) and IIA. The decision to use the transitional arrangements offered in paragraph 234a of the December 2024 NPPF and proceed with a Housing Requirement figure that is 84% of the local housing need, is a practical one recognising that the plan is transitional but offers the best chance of making quick progress to meet a high proportion of the latest need figure without disrupting planned supply and maintaining a plan-led approach.

### **Affordable Housing**

- 4.101. The SHNA Addendum (2024) updates the mix of housing required and concludes that a Housing Requirement of 1,206 net new homes per annum does not really show any notable differences from the analysis in the 2023 SHNA, although there is a notable increase in the need for affordable housing for rent from 623 to 966 dwellings per annum.
- 4.102. The Local Plan responds to this position, and to the demonstrably lower need for affordable home ownership (including the absence of identified need for First Homes), through amendments to Policy DM2 and its associated Reasoned Justification text. These amendments clarify that First Homes will not be required on threshold sites. Instead, 10.5% of the total housing provision is to be delivered as Shared Ownership housing, compared with 13% in the adopted Local Plan (2020).
- 4.103. Policy DM2 also clarifies that, in light of the notable increase in identified need for affordable housing for rent, where Build to Rent schemes are proposed, the Council will seek 24.5% of the total Build to Rent units to be provided as affordable private rent homes, with rents capped at Local Housing Allowance levels. As the Local Housing Authority, the Council relies on the private rented sector to meet its statutory homelessness duties. Given the scale of identified need for affordable housing for rent, it is therefore justified to seek to secure access to affordable private rented dwellings to address its priority housing needs.
- 4.104. In response to representations from developers, the Council has clarified through modifications to Policy DM2 the circumstances in which a viability assessment will be considered at planning application stage. The modifications also set out how and when review mechanisms will be applied through planning obligation agreements for schemes that do not fully meet the requirements of Policy DM2 through modifications to Strategic Policy S10). These measures are intended to ensure affordable housing contributions are increased if viability improves over time.

## **Accessible and Adaptable**

4.105. Developers also made representations to the Local Plan consultations on the proposal for 100% of new dwellings to be accessible and adaptable in Policy DM1 A) ii), stating that this is not justified nor required nationally. They also specified that if mandated through Building Regulations, then this need not be set out in the Local Plan. On this basis, the Council proposes to revert to a 50% requirement in the Pre-Submission (Regulation 19) Local Plan and as set out in the adopted Local Plan (2020).

## **Older Persons**

- 4.106. Policy DM1 D) i) of the Local Plan includes a requirement for greenfield developments of more than 500 dwellings to provide 10% of market housing for older people in response to representations from developers to allocate homes to meet older persons housing needs.
- 4.107. The 2023 SHNA (Figure 6.11) estimated a need for 1,519 additional dwellings with support or care for older people by 2041 and an additional need for 886 nursing and residential care bedspaces. The assessment notes that typically it is conventional to convert bedspaces to dwellings using a standard multiplier (1.80 bedspaces per dwellings for older persons accommodation) and this would equate to around 492 dwellings. In total, the older persons analysis in the 2023 SHNA points to a need for around 2,011 units over the 2022-2041 period or 106 units per annum.
- 4.108. The SHNA Addendum (2024) analysis reviews these calculations using the same methodology but with new population projections and updated supply information and estimates a slightly lower total unit need of 1,381 units over the 2022-2041 period or 73 units per annum.
- 4.109. Based on a Housing Requirement figure of 1,210 dwellings per annum, the need for older persons specialist residential accommodation estimated in the two SHNA assessments range between 6% - 9%.
- 4.110. Policy DM1 Part D) i) is only applicable to developments of more than 500 dwellings to ensure that a critical mass of Specialist Residential Housing can be achieved. Whilst this reduces the supply across the plan period, as the proportion of market dwellings above this threshold that form part of the annual housing requirement of 1,210 is much lower, it is acknowledged in national planning practice guidance – Housing Needs of different groups (001 Reference ID: 67-001-20190722) – that the needs of particular groups of people may well exceed or be proportionally high in relation to the overall housing need figure as the former are often calculated having consideration to the whole population of an area as a baseline.
- 4.111. Mixed tenures sites that include both a mixture of ownership and rental tenures as well as housing designed for specific groups such as older people's housing, are promoted in the NPPF.
- 4.112. The Focused Consultation Additional Sites (Regulation 19) document further seeks to increase the provision of new homes specifically for older people through the allocation to

two new sites in the Key Service Settlement of Boreham. Growth Site Policies 9b and 9c are allocated for 82 new homes for older people in total and help to address the demand highlighted in the SHNA assessments on smaller sites than those targeted by Policy DM1 Part D) i).

### **Gypsies and Travellers**

- 4.113. Strategic Policies S6 and S7 propose a total of 30 new allocated permanent pitches on strategic sites for Gypsies and Travellers. Strategic Policy S6 A) sets out that the remainder of the need (10) will be met through windfall applications using the criteria of Policy DM3 and the regularisation of existing pitches.
- 4.114. Considering changes to the identified need resulting from the revisions to the PPTS in 2024, the pitch need, to be met through windfall applications and the regularisation of existing pitches increases to 14 across the plan period.
- 4.115. The Gypsy and Traveller Pitches Trajectory 2022-2041 (April 2026) (LDS021: Gypsy, Travellers and Travelling Showpersons Trajectory (April 2026) (Available online via Local Plan Review), in the Local Plan shows that already five windfall applications for five pitches have been granted planning permission. The Trajectory also includes the completion of a new site providing 9 pitches in 2022/23 via a planning obligation relating to strategic sites allocated in a previous Development Plan. The Council can therefore demonstrate that its policy approach of combining strategic site allocations and windfall permissions is sound.
- 4.116. The Council's SHELAA is open all year round so landowners can submit a new site on a rolling basis. In response to the low number of sites submitted for Gypsy and Traveller pitches through this process relative to the level of need identified in the draft GTAA, the Council conducted a bespoke Call for Gypsy and Traveller Sites in the Autumn of 2023. Two sites were submitted, both of which were in the Green Belt and have since been granted planning permission using the criteria of Policy DM3. One additional site (forming one pitch) was submitted to SHELAA in September 2024. All three sites constitute the five windfall sites that has since been granted planning permission, as referenced above.
- 4.117. The Council also considered whether it was feasible to expand existing public sites, but this option was dismissed on the basis that it would result in sites being larger the preferred 'around 10' site size.
- 4.118. The PPTS requires local planning authorities in producing their Local Plan to identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of sites against their locally set targets. Given the dynamics of the site allocations and the lack of sites submitted to the SHELAA and the bespoke Call for Gypsy and Travellers sites, it has not been possible to meet this requirement. The lack of a five-year supply of pitches was a material consideration in the recent granting of the windfall planning permissions and will continue to be a material consideration when sites are submitted for planning permission at the development management stage.
- 4.119. The Council will endeavour to ensure early delivery of additional pitches within the strategic site allocations wherever possible. The current supply of and need for new Gypsy and

Traveller pitches using the 2024 PPTS and the breakdown of need set out in the GTAA is shown in Figure 13 below.

**Figure 13: Gypsy and Traveller need and supply**

	2023-27	2028-32	2033-37	2038-41	Total 2023-42
<b>Meet definition</b>	24	6	8	6	44
<b>Supply</b>	5	0	10	20	35
(Shortfall)/Surplus	-19	-6	2	14	-9

- 4.120. The Chelmsford GTAA, adjusted to allow for the 2024 revisions to the PPTS, also identified a need for 27 pitches from households not meeting the December 2024 PPTS definition of Gypsies and Travellers. These needs are reflected in Policy DM1 Part C) ii) (Specialist Residential Accommodation).
- 4.121. Paragraph 30 of the 2024 PPTS states that the implementation of policies set out in the NPPF will also apply to plan-making and decision-taking for traveller sites. It goes on to state that in applying those implementation provisions to traveller sites, references in those provisions in the NPPF should be read to include policies in the PPTS. On this basis it seems logical that for the purposes of plan-making, the 2023 PPTS that was published alongside the December 2023 NPPF, would apply to transitional plans being examined against the 2023 NPPF. In this scenario the need to be met through windfall applications and the regularisation of existing pitches reduced to 10 across the plan period of which 50% has already been met through the windfall permissions granted during 2024 – 2026.

### **Travelling Showpeople**

- 4.122. Strategic Policies S6 and S7 propose a total of 28 new allocated permanent plots on strategic sites for Travelling Showpeople. Strategic Policy S6 A) sets out that the remainder of the need (10 plots) identified in the GTAA, will be met through windfall applications using the criteria of Policy DM3 and the regularisation of existing plots.
- 4.123. Since the publication of the Preferred Options (Regulation 18) Local Plan, the Council propose to relocate the 10-plot allocation in the North East Chelmsford Garden Community (Strategic Site 6) which is already subject to an approved masterplan, to the East Chelmsford Garden Community (Strategic Site 16a), and increase provision from 10 to 13 plots. The North East Chelmsford Garden Community consortium have agreed to provide 10 pitches for Gypsy and Travellers in lieu of the Travelling Showpeople Plots.
- 4.124. The Travelling Showpeople Plots Trajectory 2022-2024 (April 2026) in the Local Plan shows that 15 plots within strategic allocations have a resolution to grant planning permission and 8 plots have completed as part of a planning application allowed on appeal (Appeal reference: PP/W1525/W/24/3341747). The need arising from 8 plots at this yard were included in the final Chelmsford GTAA, but the need associated with the three undeveloped plots were not considered.

- 4.125. The site granted planning permission on appeal was the only proposed Travelling Showpeople site in the SHELAA. A bespoke call for sites for Travelling Showpeople plots was not conducted alongside the Call for Gypsy and Traveller Sites, as the Preferred Options Local Plan proposed sufficient allocations to meet the needs identified in the draft GTAA.
- 4.126. It is not possible to expand the existing Travelling Showpeople sites and the intensification of plots on existing sites has led to the overcrowding problems identified as net new need in the Chelmsford GTAA.
- 4.127. Including the additional current need associated with the three plots not yet developed at the appeal site, Figure 14 below sets out the current supply of, and need for, new Travelling Showpeople plots using the 2024 PPTS and the breakdown of need set out in the GTAA.

**Figure 14:** Travelling Showpeople need and supply

	2023-27	2028-32	2033-37	2038-41	Total 2023-42
<b>Meet definition</b>	29	7	3	2	41
<b>Supply</b>	11	15	0	13	39
<b>(Shortfall)/Surplus</b>	-18	8	-3	11	-2

- 4.128. Across the plan period the need to be met through windfall applications is relatively small (2 plots) however this supply is reliant on the provision of 13 plots at East Chelmsford Garden Community (Strategic Growth Site 16a), which is currently the subject of ongoing discussions with Wates Developments (Developer of SGS 16a).
- 4.129. Currently, the Travelling Showpeople Plots Trajectory shows a supply of 11 plots against an identified need for 29 plots between 2023-2027. Consequently, the Council will endeavour to ensure earlier delivery of additional plots within the strategic site allocations wherever possible.

## Land Supply

### 5-Year Land Supply

- 4.130. Following the conclusion of the Pre-Submission Regulation 19 Local Plan consultation in February-March 2025, several significant events outside of the Council's control took place prompting a reassessment and re-profiling of the Council's housing land supply.
- 4.131. The Council's five-year housing land supply was re-assessed and re-published in August 2025. As a result of this reassessment, there was a risk that submitting the Local Plan in the form published for the Regulation 19 consultation in February 2025 could have resulted in the Inspector concluding that a five-year housing land supply would not be demonstrable at the point of adoption.
- 4.132. Using the [Housing Site Schedule \(August 2025\)](#) published alongside the Focused Consultation on Additional Housing Sites (which did not include the Additional Sites), the

five-year housing land supply at the point of submission (Years 2 – 6) was estimated to be 8,010 dwellings. At that time the estimate housing requirement figure for the five-year housing land supply calculation was 1,622 dwellings per annum on submission. This was based on the proposed Housing Requirement figure of 1,210 dwellings per annum, the estimated shortfall in housing completions from the new base period of the emerging Local Plan (1,672 dwellings) and the required 5% buffer to ensure choice and competition in the market for land. Without the additional sites it was estimated that there will only be 4.93 years of housing land supply (8,010/1,622) on adoption of the Local Plan as set out in Figure 15 below.

**Figure 15:** Estimate Five-year Housing Land Supply Position Statement on adoption of Local Plan in August 2025

<b>Housing Requirement</b>	<b>1,210 dwellings per annum equals 6,050 dwellings over 5 years.</b>
<b>Historic Shortfall Baseline Year 2022/23</b>	1,672 cumulative completions below the Housing Requirement of 1,210 dwellings per annum since the base date of the plan (assumes 518 completions in 2025/26 as per the <a href="#">Housing Site Schedule (August 2025)</a> )
<b>5% additional buffer</b>	$6,050 + 1,672 + 5\% (386.1) = 8,108.1/5 = 1,621.62$
<b>5-year supply</b>	<b>4.93 years</b> (8,010/1,622)

- 4.133. The additional housing land supply identified in the Focused Consultation on Additional Sites (Regulation 19) document through the 11 new sites and three expanded housing sites was estimated to add 1,297 dwellings to the five-year housing land supply on submission (Years 2 - 6), increasing the total estimate supply to 9,327 dwellings. It was estimated that this would enable a land supply of 5.75 years (9,327/1622) to be demonstrated on adoption of the Local Plan. Across the plan period the additional 11 new sites and three expanded housing sites are estimated to add 1,592 dwellings in total to the housing land supply.
- 4.134. All housing land supply information has been re-assessed and re-published from the updated baseline of 1 April 2026. Using a Housing Requirement figure of 1,210 dwellings per annum and a housing supply of 8,962 dwellings forecast to be completed in the five-year period 2026/27 – 2030/31 in the April 2026 Housing Site Schedule (LDS012: Five Year Housing Site Schedule (April 2026) (Available online via [Local Plan Review](#)), the Council can demonstrate a suitable supply of deliverable sites for housing on adoption of the Local Plan for 5.45 years.

**Figure 16:** Five-year Housing Land Supply Position Statement on adoption of Local Plan

<b>Housing Requirement</b>	<b>1,210 dwellings per annum equals 6,050 dwellings over 5 years.</b>
<b>Historic Shortfall Baseline Year 2022/23</b>	1,783 cumulative completions below the Housing Requirement of 1,210 dwellings per annum since the base date of the plan (LDS014: Housing Trajectory (April 2026) (Available online via <a href="#">Local Plan Review</a> )
<b>5% additional buffer</b>	$6,050 + 1,783 + 5\% (391.65) = 8,224.65/5 = 1,644.93$
<b>5-year supply</b>	<b>5.45 years</b> (8,962 / 1,645)

4.135. The calculation formula is as follows:

Stage 1: Multiply housing requirement by five (years)

Stage 2: Add historic shortfall (if relevant)

Stage 3: Add 5% to the sum of Stages 1 and 2 = five-year housing requirement

Stage 4: Divide five-year housing requirement by five (years) = Annual requirement

Stage 5: Divide annual requirement by deliverable housing supply = Years of supply

4.136. A 5% buffer is included in the calculation despite not being a requirement of the December 2023 NPPF to ensure choice and competition in the market for land and demonstrate the position for decision making upon adoption of the Local Plan.

4.137. In the latest published Housing Delivery Test measurement (2023 results published in December 2024), Chelmsford exceeded the Housing Delivery Test Threshold by 16%, therefore no further buffer is required.

4.138. In accordance with the Housing Delivery Test Measurement Rulebook, as updated on the 12 December 2024, adjustments for student and other forms of communal accommodation have been applied to the latest Housing Site Schedule. These adjustments use nationally prescribed ratios derived from England Census data, namely 2.4 for student accommodation and 1.9 for other communal accommodation.

4.139. The Housing Site Schedule published in April 2026 contains four sites proposed for residential institutions for older people in the form of care homes. The 1.9 ratio has been applied to the total capacity of these sites to establish the amount of accommodation released in the housing market. The output figures shown in the Housing Site Schedule is the output from the weighted calculation, not the total number of bedrooms proposed.

4.140. The Housing Site Schedule published in April 2026 also contains a site for student housing. A ratio of 2.4 has been applied to the total number of net additional student accommodation and the output from the weighted calculation is shown in the Housing Site Schedule.

4.141. The definition of 'Deliverable' is set out in the NPPF December 2024, as amended in February 2025. The definition states that sites which do not involve major development and

have planning permission and all sites with detailed planning permission should be considered deliverable until permission expires.

- 4.142. Where a site has outline planning permission for major development, has been allocated in a development plan, has grant of permission in principle or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.
- 4.143. The annually updated Housing Site Schedule provides information which includes the planning status of sites, whether works have started and the projected phasing of the delivery of housing units on each site.
- 4.144. The updated Housing Site Schedule includes proposed new site allocations in the Local Plan. For the purposes of decision making, any completions associated with these sites have been discounted from the 5-year supply unless the site has full planning permission (LDS011: Five Year Housing Land Supply Methodology (April 2026) (Available online via [Local Plan Review](#)). This reduction of 1,750 dwellings produces a total supply of 7,212 deliverable dwellings and is reflected in the Council's [Five-Year Housing Land Supply Position Statement April 2026](#) for the purposes of decision making only.
- 4.145. The information in the Housing Site Schedule is collated and reviewed through the following methods to ensure the definition of deliverable provided in the NPPF is adhered to.

### **Regular Site Visits**

- 4.146. Sites on the Housing Site Schedule will receive regular site visits throughout the year. These are generally carried out by the following Council Officers - Development Management Planning Officers, Development Monitoring and Land Supply Officer.
- 4.147. Development Management Planning Officers will visit sites periodically, especially the larger sites, if further planning applications are submitted or meetings are taking place on site. Planning Officers update the Development Monitoring and Land Supply Officer of progress on site.
- 4.148. The Development Monitoring and Land Supply Officer makes regular visits, every quarter, to a selection of different sites. Sites selected to be visited will largely be those which are known to have commenced or those in a similar area. Both large and small sites are visited. Throughout the year most sites which have commenced will have at least one visit by the Development Monitoring and Land Supply Officer.
- 4.149. The Development Monitoring and Land Supply Officer also receives regular updates from Registered Social Landlord's in respect of expected completions for affordable housing units within developments. This, alongside site visits, helps to accurately monitor the delivery rates for affordable housing.

### **Information Received by Development Management Planning Officers**

- 4.150. Development Management Planning Officers provide the Development Monitoring and Land Supply Officer with regular updates on site progress, especially in respect of the larger sites, and those with various reserved matter applications/anticipated reserved matters applications. The information received usually comes directly from the site developer.

### **Building Control Weekly Reports**

- 4.151. The Development Monitoring and Land Supply Officer receives weekly reports of all Building Control Applications received, approved, or completed. This gives an indication of starts and completions on sites. This enables the Development Monitoring and Land Supply Officer to take an informed view of the housing delivery rates within the Housing Site Schedule for sites which have commenced or when they are due to commence.

### **CIL Commencement Monthly Reports**

- 4.152. The Development Monitoring and Land Supply Monitoring Officer runs a monthly report which provides a summary of all developments where a CIL commencement notice has been received. This enables the Development Monitoring and Land Supply Officer to track all commencements and schedule site visits to monitor completions.

### **Annual Confirmation of Delivery Rates with Developers**

- 4.153. Towards the end of the monitoring year the Development Monitoring and Land Supply Officer contacts promoters/landowners of larger development sites (predominately sites over 10 dwellings) setting out the Council's projected delivery rates for their site. The Developer/Agent of each site is asked to confirm or update these projected delivery rates and provide a reason for any changes.

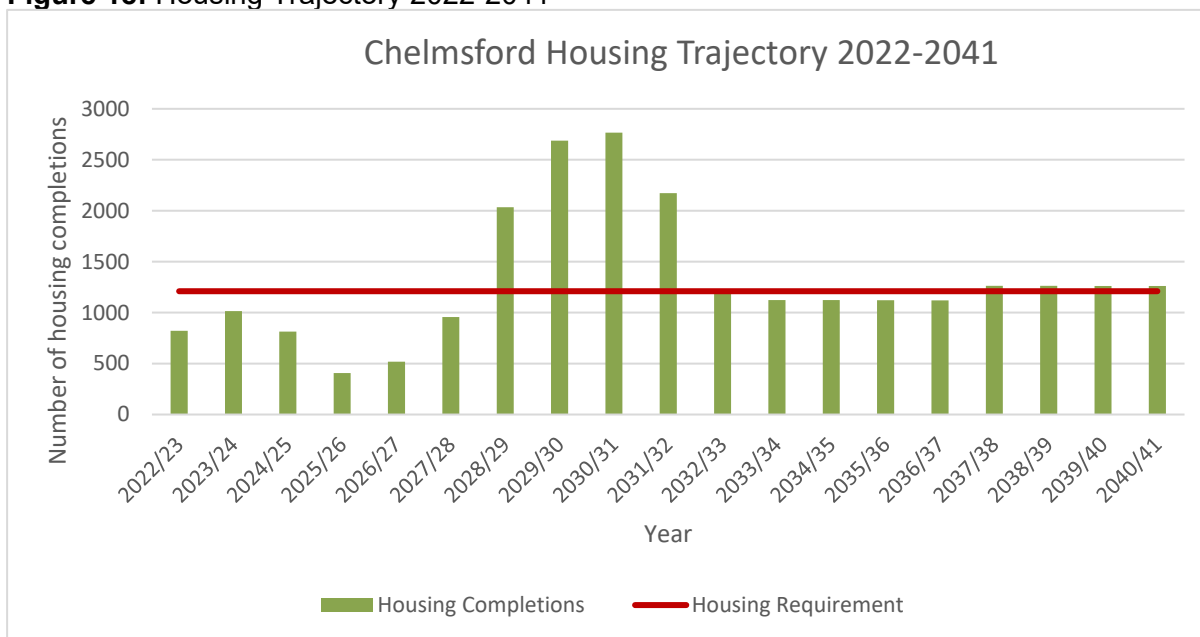
### **Monitoring Completed Developments**

- 4.154. The Development Monitoring and Land Supply Officer reviews the planning timescales and build out rates for complete developments to help inform the delivery rate assumptions for similar sized sites in the Housing Site Schedule.
- 4.155. A combination of the above methods enables the Council to use the best available information to determine its annual Housing Site Schedule.
- 4.156. Provision is made for a total of 24,914 new homes in the period 2022 – 2041 in the Local Plan as set out in Figure 17 below.

**Figure 17: Housing Supply 2022/23 – 2023/24**

Housing Supply 2022/23 – 2040/41	Net new homes
Completions 2022/23 – 2025/26	3,057
Sites with planning permission (excludes existing Local Plan allocations)	2,259
Existing Local Plan allocations	11,953
New Local Plan allocations	5,427
Windfall allowance (2028-2041)	2,218
<b>Total Supply</b>	<b>24,914</b>

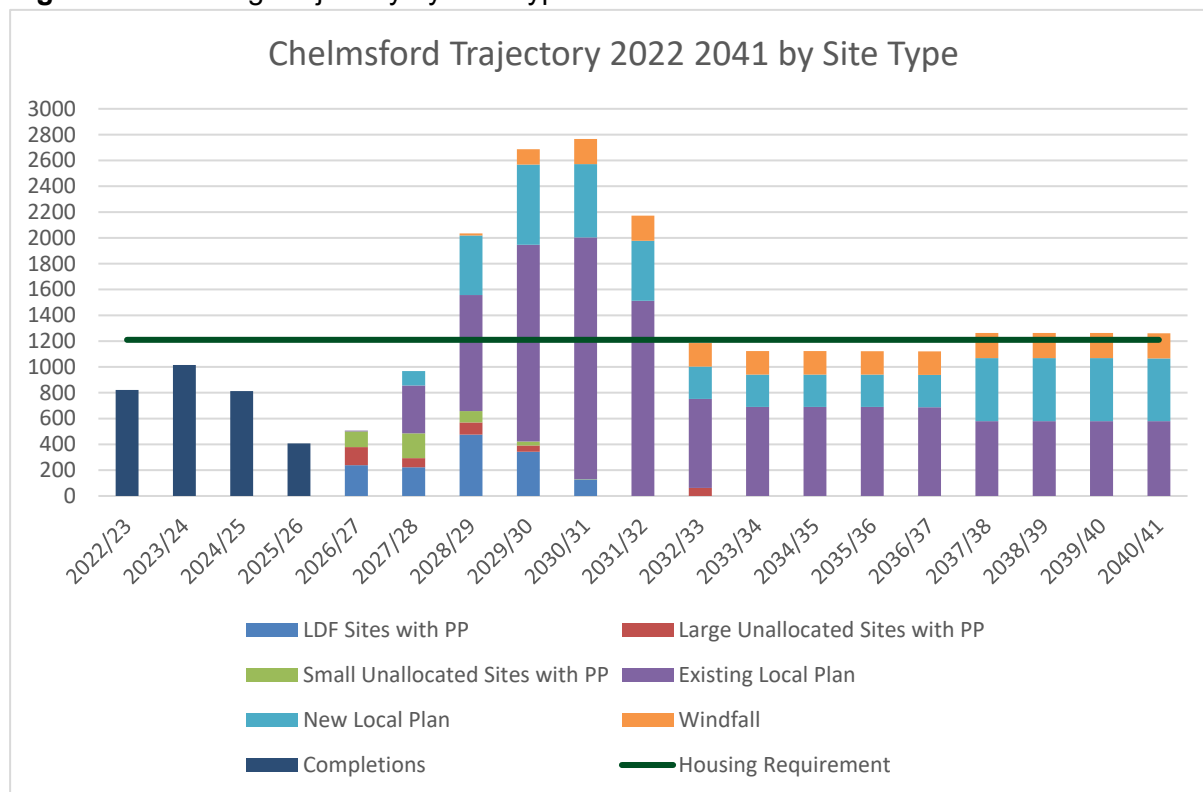
**Figure 18: Housing Trajectory 2022-2041**



4.157. The Housing Trajectory shows a high housing supply in years 2028/29 – 2031/32. It is currently forecasting a supply close to or above the Housing Requirement level for most years.

4.158. The key components of the housing trajectory by development plan period are set out below.

**Figure 19:** Housing Trajectory by Site Types



4.159. The sites in Figure 19 above have been grouped by their development plan period, other than unallocated sites, windfall sites and completions, from the base period of the Local Plan. The ‘LDF’ sites relate to allocations from the earliest adopted plan period and comprise sites that were allocated in the former development plan documents known as the Town Centre Area Action Plan, North Chelmsford Area Action Plan and Site Allocation Development Plan Document. All these sites feature in the ‘Sites with planning permission (excludes existing Local Plan allocations)’, line of Figure 17, together with the large and small unallocated sites.

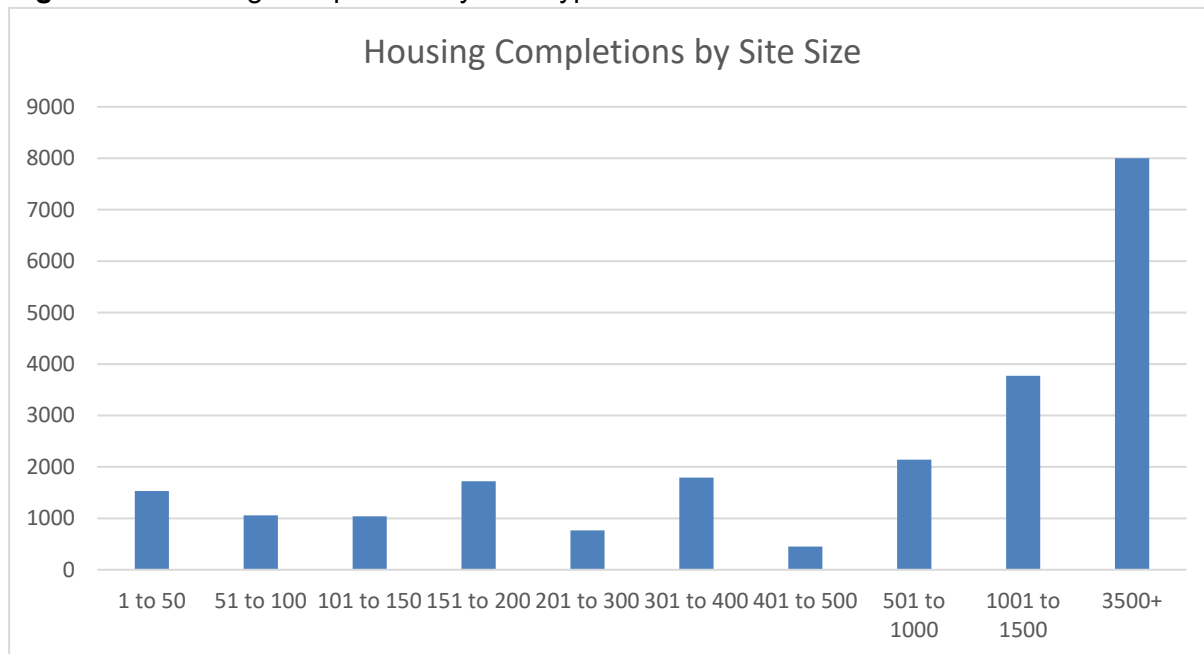
4.160. Sites relating to Growth Areas 1, 2 and 3 in the adopted Local Plan (2020) and new Local Plan have been separated out to align with Figure 17 and show average annual forecast completions for years 2032 – 2041 by existing Local Plan allocations and new Local Plan allocations.

4.161. Figure 19 shows that most of the supply in the early part of the Plan period comes from sites that were allocated in the adopted Local Plan (2020) or earlier development plan documents. The new Local Plan allocations are not forecast to contribute a large proportion of the net new supply until approximately halfway through the plan period although the Focused Consultation Additional Sites (Regulation 19) document improves the contribution from new supply in the first five years from adoption.

4.162. The supply is varied in terms of when sites were allocated and the volume of sites with planning permission in the earlier stages of the plan period.

4.163. The volume of dwellings to be delivered on different site sizes is reasonably well distributed as shown in Figure 20 below. The volume of dwellings to be delivered on sites of 3,500 units plus is not as high as shown in the graph because 2,170 dwellings out of the 8,000 shown are forecast to be delivered outside of the plan period.

**Figure 20:** Housing Completions by Site Type



4.164. Completions are forecast to vary over time, but this has been the case historically in Chelmsford as shown in Figure 21 below.

**Figure 21:** Housing Completions 2001 - 2026



- 4.165. A key advantage of being a Plan-led authority is the volume of supply that is within the planning system whether pre-application advice, planning applications or planning permissions. As of October 2025, there were in the region of 800 new homes which were the subject of pre-application discussions. In addition, Planning Performance Agreements in place on the strategic allocations in the adopted Plan comprised just over 11,447 dwellings. At the same October baseline, there were 11,571 net new dwellings within major applications currently being considered by the City Council and 2,667 new homes which have an extant planning permission but yet to be built.
- 4.166. The Council scrutinises new housing delivery statistics on an annual basis, with 10 years' worth of key housing statistics monitoring trends and targets to ensure housing supply and forecasts remain robust.

### Small Sites

- 4.167. As of April 2026, 1,398 new dwellings are due to be delivered on small sites of 1 hectare or less, which equals 8% of the existing Local Plan allocations (11,953) and new Local Plan allocations (5,427). This excludes any self and custom build houses that will be delivered on developments of more than 100 dwellings in accordance with Policy DM1 C) i).

**Figure 22:** Extract Summary of Small Sites from April 2026 Housing Site Schedule

Total Number of Small Sites	Total Number of dwellings approved on Small Sites
185	1398
Number of Small Sites which are windfall	Total Number of dwellings approved on small sites which are windfall
158	631

- 4.168. The number of self-build and custom build dwellings that are due to be delivered on development sites of more than 100 dwellings across the plan period is 787 in total.

**Figure 23:** Self-Build and Custom Build (SBCB) requirements on Local Plan Sites

Site ref. no	Site Name	Total no. Dwellings	New Local Plan	Adopted Local Plan	SBCB 5%
<b>Growth Area 1</b>					
<b>1</b>	Previously Developed Land	2782	844	1938	83
<b>2</b>	West Chelmsford	880	0	880	44
<b>3a</b>	East Chelmsford Manor Farm	360	0	360	18
<b>3b</b>	East Chelmsford Land North of Maldon Road	0	0	0	0
<b>3c</b>	East of Chelmsford Land South of Maldon Road	109	0	109	5.45
<b>3d</b>	East of Chelmsford Land North of Maldon Road	65	0	65	0

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Site ref. no	Site Name	Total no. Dwellings	New Local Plan	Adopted Local Plan	SBCB 5%
5	Land Surrounding Telephone Exchange, Ongar Road Writtle	25	0	25	0
18a	Land North West of Chelmsford North of Hollow Lane	100	100	0	5
19	Land West of Patching Hall Lane	200	200	0	10
<b>Sub-total</b>		<b>4521</b>			<b>165.45</b>
<b>Growth Area 2</b>					
6	North East Chelmsford (Chelmsford Garden Community)	5,580	0	5580	279
7a	Great Leighs Land at Moulsham Hall	750	0	750	37.5
7b	Great Leighs Land East of London Road	390	140	250	19.5
7c	Great Leighs Land North and South of BanTERS Lane	113	0	113	5.65
8	North of Broomfield	512	0	512	25.6
9b	Land to the East of 118 to 124 Plantation Road, Boreham	60	60	0	0
9c	South of Main Road and Dukes Wood Close, Boreham	22	22	0	0
14b	Land south of Ford End Primary School Ford End	75	75	0	0
15	Little Boyton Hall Farm Rural Employment Area	0	0	0	0
<b>Sub-total</b>		<b>7,502</b>			<b>367.25</b>
<b>Growth Area 3</b>					
16a	East Chelmsford Garden Community (Hammonds Farm)	3000	3000	0	150
16b	Land adjacent to A12 Junction 18	0	0	0	0
10	North of South Woodham Ferrers	1220	0	1220	61
11b	Land at Kingsgate, Bicknacre	20	20	0	0
11c	Land West of Barbrook Way, Bicknacre	250	250	0	12.5
12	St Giles, Bicknacre	50	0	50	0
13	Danbury	101	0	101	0
17a	Land North of Abbey Fields East Hanningfield	11	11	0	0
17b	Land east of Highfields Mead, East Hanningfield	20	20	0	0
17c	Land South of Rough Hill Complex, East Hanningfield	115	115	0	5.75
17d	Land South and South East of East Hanningfield Village	150	150	0	7.5
17e	Land South of Windmill Farm, Back Lane, East Hanningfield	40	40	0	0

Site ref. no	Site Name	Total no. Dwellings	New Local Plan	Adopted Local Plan	SBCB 5%
20	Land to East and North of Rettendon Place	350	350	0	17.5
21a	Land North of Old Rectory Lodge, Main Road, Woodham Ferrers	15	15	0	0
21b	Land North of Congregational Church, Main Road, Woodham Ferrers	15	15	0	0
<b>Sub-total</b>		<b>5357</b>	<b>5427</b>	<b>11953</b>	<b>254.25</b>
<b>Total</b>		<b>17,380</b>			<b>786.95</b>

- 4.169. When combined with the 1,398 dwellings due to be delivered on small sites, the total proportion of provision on small sites increases to 12.6% of the existing and new Local Plan allocations.
- 4.170. Whilst not currently embedded in national planning policy and not relevant to the examination of the Local Plan under transitional arrangements, the Housing Site Schedule published in April 2026 also contains 1,360 dwellings to be provided on medium size sites of between 1 – 2.5 hectares in size. This equals 7.6% of the total Local Plan allocations.

### Windfall allowance

- 4.171. Paragraph 72 of the NPPF (December 2023) states that local planning authorities may make an allowance for windfall sites as part of anticipated supply providing any allowance is realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. As can be seen in Figure 19 above, windfall forms a relatively small part of the supply forecasts.
- 4.172. National Planning Practice Guidance (023 Reference ID: 3-023-20190722) goes on to state that local planning authorities can identify broad locations in years 6 - 15, which could include a windfall allowance based on a geographical area.
- 4.173. The City Council have therefore sought to consider and assess the historic windfall delivery rates, as well as expected future trends. From this it is then possible to estimate an expected level of windfall allowance to be included in its Housing Trajectory and to assist in the calculation of the five-year housing land supply.
- 4.174. To ensure there is no double counting within the projected housing figures for Chelmsford no sites within the windfall assessment are allocated sites within the adopted Local Plan.
- 4.175. Historic windfall completions taken from the recorded completions within the Council area for the last 12 years from sites which are unallocated within any of the previously adopted Development Plan Documents or within the new Local Plan, are set out below:

**Figure 24:** Historic Windfall Completions

Year	Total Number of Windfall Completions		Number of which were completed on small sites <sup>2</sup>
2012/13	139		114
2013/14	274	-130 Hayes Leisure Park <sup>3</sup> = 144	144
2014/15	277	-150 Hayes Leisure Park = 127	127
2015/16	178		175
2016/17	347		343
2017/18	358		358
2018/19	227		209
2019/20	197		181
2020/21	134		129
2021/22	104		104
2022/23	198		198
2023/24	204		203
2024/25	219		219
2025/26	198		198
<b>TOTAL</b>	<b>3054</b>	<b>2774 (with Hayes deductions)</b>	
<b>Average per annum</b>	<b>218</b>	<b>198 (with Hayes deductions)</b>	

4.176. Projected windfall completions are taken from sites with approved planning permissions but have not yet been recorded as being complete within the projected Housing Site Schedule. These sites are unallocated within the previously adopted Development Plan Document and the new Local Plan. They are set out in Figure 25 below:

**Figure 25:** Projected Windfall Completions

Year	Number of projected Windfall Completions (based on Windfall sites with Planning Permission)
2026/27	261
2027/28	274
2028/29	182
2029/30	79
2030/31	3
2031/32	0
2032/33	62
2033/34	0
2034/35	0
2035/36	0
<b>TOTAL</b>	<b>861</b>

<sup>2</sup> Sites no larger than 1 hectare

<sup>3</sup> This deduction relates to the approvals to regularise the permanent occupation of park homes at Hayes Leisure Park, Hayes Chase, Battlesbridge, Essex

- 4.177. The numbers in Figures 24 and 25 use the same April 2026 baseline date to ensure there is no double counting.
- 4.178. The City Council has recorded an average windfall completion rate of 218 dwellings per annum over the past fourteen years. However, it is acknowledged that in years 2013/14 and 2014/15, 130 and 150 units respectively resulted from the regularisation of park homes being permanently occupied at Hayes Leisure Park. These figures could be considered atypical and unlikely to be replicated in a 'normal' monitoring year. Although these units are technically 'windfalls' and could legitimately be included within an assessment, the City Council does not seek to rely upon them when projecting future windfall delivery. With these anomalous figures removed the historic average windfall completion rate reduces to 198 units per annum.
- 4.179. There are a further 861 dwellings which have planning permission on sites defined as windfall sites within the City Council's Housing Site Schedule, which have yet to be completed. Of these, 799 appear in the first five years of the Schedule. Over these five years this equates to an average projected completion rate of approximately 160 windfall dwellings per annum.
- 4.180. It is considered that the windfall projections for the first two years in the Housing Site Schedule are likely to be reasonably accurate and limited additions will come forward in these years, owing to the need to commence planning permissions within three years. However, years three, four and five are likely to see an increase as further (currently unknown) planning permissions on windfall sites are approved each year. It is therefore considered appropriate to add further projected windfalls to these three years.
- 4.181. On the basis of the data available to the City Council, it is considered reasonable to make up the windfall allowance to 198 dwellings per annum for the years 2028/29, 2029/30 and 2030/31 within the April 2026 Housing Trajectory as illustrated in Figure 26 below. This is based on the 198 average historic windfall completions seen over the last ten years (excluding the numbers seen at Hayes Park).

**Figure 26:** Projected Windfall Completions with windfall allowance added to 5-Year Housing Supply

Year	Number of projected Windfall Completions (based on Windfall sites with Planning Permission)	Figure to be added to five-year Housing Supply to make up projected windfall allowance of 198 per annum
2026/27	261	0
2027/28	274	0
2028/29	182	16
2029/30	79	119
2030/31	3	195
<b>TOTALS</b>	<b>799</b>	<b>330</b>

- 4.182. It is therefore considered that the Council can demonstrate that this number of windfall completions have consistently become available in the local area (through past completion

records) and will continue to provide a reliable source of supply (based on the April 2026 Housing Site Schedule of windfall sites with planning permission).

- 4.183. Based on the historic evidence for windfall completions and future windfall projections there is compelling evidence to support 198 dwellings per annum for years one to five in the Council's Housing Trajectory.
- 4.184. Historic evidence further supports that 195 dwellings per annum is a realistic figure which can be relied upon for the longer-term future projections for windfalls.

**Figure 27:** Projected Windfall Completions with windfall allowance added to years 2031/32 to 2040/41 of the Housing Trajectory

Year	Number of projected Windfall Completions (based on Windfall sites with Planning Permission)	Figure to be added to Housing Trajectory to make up projected windfall allowance of 195 per annum
2031/32	0	195
2032/33	62	133
2033/34	0	195
2034/35	0	195
2035/36	0	195
2036/37	0	195
2037/38	0	195
2038/39	0	195
2039/40	0	195
2040/41	0	195
<b>TOTAL</b>	<b>62</b>	<b>1888</b>

### Supply Buffer

- 4.185. Historically the Council has included a housing supply buffer of between 16 – 18% across different Local Plan periods.
- 4.186. To help achieve the step change in the housing requirement and comply with the NPPF transitional arrangements, the supply buffer has been reduced to 8.4%. Using the supply buffer envisaged in the Preferred Options (Regulation 18) Local Plan, enables the Plan to quickly pivot and proceed under the transitional arrangements for a plan-led system. The NPPF does not require a supply buffer, and the supply of new dwellings will be closely monitored through the Authority Monitoring Report. The Local Plan includes a monitoring framework which sets out a series of triggers and actions relating to Strategic Policy S6, an extract of which is set out below:

**Figure 28:** Extract of Monitoring Framework – Strategic Policy S6 Housing and Employment Requirements

Trigger for action	Contingency / Action
(1) Failure to deliver 95% of the number of net new homes required over a 3-year rolling period as published annually by the Ministry for Housing, Communities	(1&2) Publish an Action Plan setting out key reasons for the situation and actions the Council and other parties need to take (2) Plan for a 20% buffer on the Council's five year housing land supply, if necessary

Trigger for action	Contingency / Action
<p><b>and Local Government in the Housing Delivery Test</b></p> <p><b>(2) Failure to deliver 85% of the number of net new homes required over a 3-year rolling period as published annually by the Ministry for Housing, Communities and Local Government in the Housing Delivery Test</b></p> <p><b>(3) Failure to deliver 75% of the number of net new homes required over a 3-year rolling period as published annually by the Ministry for Housing, Communities and Local Government in the Housing Delivery Test.</b></p>	<p>by bringing additional sites forward into the supply</p> <p>(3) Instigate a full or focused formal review of the Local Plan</p> <p>(2-6) Consider whether the Policy requirement itself needs to be reviewed as part of a full or focused formal review of the Local Plan set out Policy S13</p>

## Alternative Policy Approaches

- 4.187. The Local Plan review has considered a number of alternative policy approaches and options including different development quanta and spatial strategy options. Each policy in the Preferred Options Local Plan Consultation Document included 'Alternatives considered' which were tested in the Preferred Options Integrated Impact Assessment (IIA), alongside the proposed policies, to help ensure that the final version of the plan is justified and an appropriate strategy, when considered against the alternatives and other available and proportionate evidence.
- 4.188. Alternative spatial strategy options have also been tested in other evidence base reports such as the Water Cycle Study Scoping Report and Preferred Options Traffic Modelling Report. Both the Pre-Submission IIA and Additional Sites IIA Addendum consider different spatial strategy and development site options for growth. More detail is set out in each evidence base report and the Spatial Strategy and Strategic Sites Topic Paper.
- 4.189. In summary, key alternatives considered during the plan review in relation to housing include:
- **Not having a Housing Requirement Figure** - the NPPF requires local planning authorities to proactively meet the need for new housing, employment and retail. Local Plans should set a clear strategy for their area to encourage sustainable growth and inward investment.
  - **Having a lower Housing Requirement Figure** – this was discounted because it would not be in line with the NPPF and a lower growth option performs poorly in meeting housing need as well as being likely to have a negative effect on employment, reflecting restrictions on employment growth and generating out-commuting, as residents seek employment opportunities elsewhere.
  - **Having a higher Housing Requirement Figure** – this was discounted as it performed poorly overall reflecting greater resource use with

greater uncertainty overall such as potential oversupply of housing in the plan period, disrupting co-ordinated delivery against identified need. It would also disturb the balance between housing and jobs provision.

- **Not having a Spatial Strategy** - would undermine the delivery of the Plan's Vision, Strategic Priorities and create uncertainty and ultimately lead to unplanned and uncoordinated development not supported by necessary infrastructure. It would result in the removal of specified development allocations and the Settlement Hierarchy which guides future planning decisions and promotes sustainable development.
- **Development in the Green Belt** – discounted as sufficient and suitable land is available outside the Green Belt to meet transitional development needs in a sustainable way. It would also undermine the protection of the Green Belt by national planning policy.
- **Development growth in the Green Wedge** - the Green Wedge is a locally important designation following the river valleys which have been enshrined in Chelmsford development plans since 2008 and has helped shape Chelmsford's growth. Changes to the Green Wedge boundaries to allow development growth has been discounted as sufficient and suitable land is available outside the Green Wedge to meet the areas transitional development needs in a sustainable way.

### Alternative Development Management Policies

- **Alternative threshold and percentages for Policy DM1 (Size and Type of Housing)** - the site / size threshold for DM1 A) is considered appropriate as it applies to major development, and it would be disproportionate to apply it to smaller development. The percentage requirement in DM1 A) ii) has been reduced from the Preferred Options (Regulation 18) Local Plan as it cannot currently be justified and could be mandated under Building Regulations. The latest available evidence suggests the amounts and thresholds in Policies DM1 B) and DM1 C) ii) are justified and supported through viability testing. To amend these could result in sites either being unviable for development or an unjustified overall reduction in affordable housing. The draft consultation Planning Obligations Supplementary Planning Document proposes a formula to calculate the Specialist Residential Accommodation obligation in DM1 C) ii), which has also been included in the Local Plan Viability Update where appropriate. The latest available evidence suggests the percentage in Policy DM1 C) i) will meet the identified need. The requirement for older person accommodation in Policy DM1 D) i) responds to the outputs of the methodology used in the SHNA 2023 and 2024 Addendum but the threshold has been selected to ensure a critical mass of Specialist Residential Accommodation can be provided.

- Alternative threshold sizes and percentages for Policy DM2 (Affordable Housing and Exception Sites)** – the latest available evidence suggests the amount and thresholds are justified and supported through viability testing. To amend these could result in sites being unviable for development although Policy S10 now sets out the circumstances in which a viability assessment will be considered at planning application stage and how/when review mechanisms will be applied through planning obligation agreements for schemes that cannot be fully compliant with infrastructure obligations and remain financially viable. The Local Plan prioritises affordable housing for rent on threshold sites and Build to Rent development in the form of affordable private rent capped at Local Housing Allowance levels because of the significant rise in the need for this type of housing in the 2024 SHNA Addendum. The Local Plan maintains the same percentage requirement for affordable home ownership housing set out in the Preferred Options (Regulation 18) Local Plan but has clarified that this should be provided as shared ownership housing as there was no identified need for First Homes in the 2024 SHNA Addendum.
- Give weight to all planning applications from Gypsies, Travellers and Travelling Showpeople** – this alternative was discounted in the Preferred Options (Regulation 18) Local Plan as it would not prioritise Gypsies, Travellers and Travelling Showpeople that meet the Government’s PPTS definition. The revised definition of Gypsies and Travellers in the PPTS published in December 2024 is likely to now include some of those households previously deemed outside of the definition in the final Chelmsford GTAA.

## NPPF December 2023 Checklist

- 4.190. The Local Plan submitted for examination will comprise the Pre-Submission (Regulation 19) Local Plan) and Focused Consultation Additional Sites (Regulation 19) Document. The Council has therefore reviewed these together against the requirements of the December 2023 NPPF.
- 4.191. The table below shows that the Local Plan partially meet /meet all the requirements in respect to housing. The full Local Plan Form and Contents Checklist updated in May 2026 (OSP11) is available online ([via Local Plan Review](#)). Please note that the following table supersedes the version presented in the Pre-Submission Topic Paper.

### Figure 29

#### Commentary key:

Meets December 2023 NPPF requirement
Partially meets December 2023 NPPF requirement
Does not meet December 2023 NPPF requirement

NPPF Requirement	NPPF Paragraph	Approach in the Local Plan
<i>Housing</i>		
<p>Be informed by a local housing need assessment, conducted using the standard method in national planning guidance as an advisory starting point. Any housing needs which cannot be met within neighbouring areas should also be taken into account when establishing the amount of housing to be planned for within the plan.</p>	61	<p>The plan is informed by an updated Strategic Housing Needs Assessment (SHNA) conducted using the standard method in national planning guidance. A partial update to the 2023 SHNA was carried out in 2024 via an Addendum Report. This reviewed the implications of moving from housing delivery at the proposed revised standard method for assessing housing needs of 1,206 dwellings per annum set out in the NPPF consultation document published in July 2024. Whilst updating analysis for a new housing number, the report also updates other aspects of the SHNA where new data exists. Essex authorities have a memorandum of understanding on how any unmet housing need should be addressed although using the revised housing requirement figure the housing supply buffer is significantly reduced. No requests for Chelmsford to accommodate any other authorities' needs were made at either Regulation 19 consultation and Statements of Common Ground have been agreed with all neighbouring authorities where all agree that Chelmsford are unable to accommodate any need, including unmet need from other authorities.</p>
<p>Identify the size, type and tenure of housing needed for different groups.</p> <p>Assess a local need for retirement for retirement and care housing provision when considering the housing needs of older people.</p>	63	<p>The 2024 SHNA Addendum Report updates the need for affordable housing and older and disabled people.</p> <p>Policy DM1 includes a requirement for 10% of market housing on greenfield sites of more than 500 dwellings to be provided for older persons in addition to site allocations SGS7a, GS9b and GS9c</p> <p>Policy DM2 includes a reference to <a href="#">build to rent</a> housing and the need for affordable private rent dwellings.</p> <p>Local need for Specialist Residential Accommodation is considered in the SHNA and 2024 update as well as the 2023 GTAA.</p> <p>ECC published a Supported and Specialist Housing and Accommodation Needs Assessment in 2025 which provides estimates of future need for supported and</p>

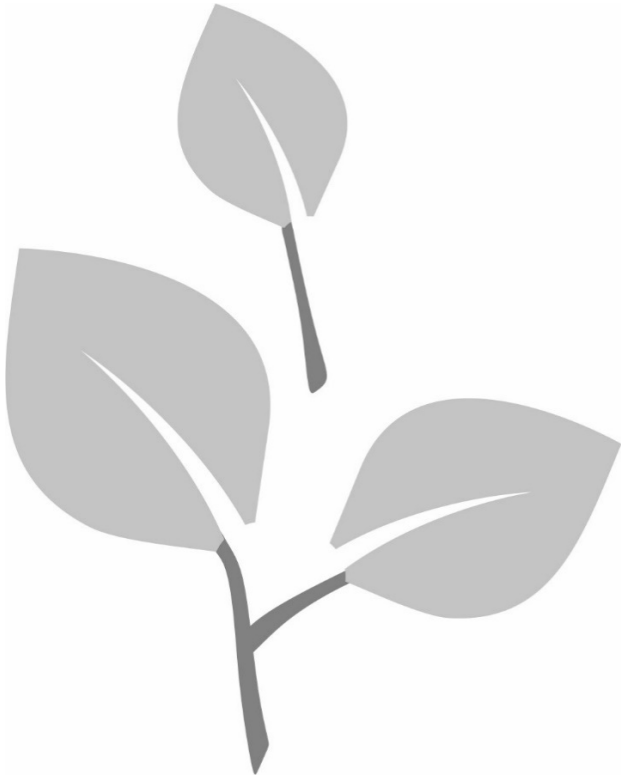
NPPF Requirement	NPPF Paragraph	Approach in the Local Plan
		<p>specialist housing accommodation. The Reasoned Justification for Policy DM1 notes that the Council will refer to the latest assessment of housing need and work with ECC to identify the housing need for Specialist Residential Accommodation.</p> <p>Polices DM1 and DM2 are supported a revised draft Planning Obligations SPD.</p>
<p>Provision of affordable housing should not be sought for residential developments that are not major development, other than in designated rural areas. The definition of major development in the Glossary of the NPPF is development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more.</p> <p>Where a need for affordable housing is identified, specify the type of affordable housing required.</p>	<p>64, 65</p>	<p>Set out in Policy DM2 and supported by a revised draft Planning Obligations SPD.</p>
<p>Expect at least 10% of the total number of homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups. A minimum of 25% of all affordable homes should be First Homes, subject to the transitional requirements set out in the Planning Practice Guidance.</p>	<p>66</p>	<p>Set out in Policy DM2 and supported by a revised draft Planning Obligations SPD.</p> <p>Reasoned Justification for Policy DM2 retains 10.5% requirement for shared ownership housing only. The SHNA (2023), including the 2024 addendum report, concludes that 25% of affordable housing should not be provided as First Homes given the price caps mean any First Homes are unlikely to come forward other than as a one bedroom homes and therefore a reasonable mix of this tenure would not be possible. The report does not evidence a need for First Homes or discounted market housing more generally but states that shared ownership is likely to be suitable for households with more marginal affordability as it has the advantage of a lower deposit and subsidised rent.</p> <p>2024 NPPF (footnote 31) removed the requirement to deliver a minimum of 25% of affordable housing as First Homes.</p>
<p>Set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.</p>	<p>67, 68</p>	<p>There are eight designated neighbourhood areas, six with made Neighbourhood Plans and two in progress. The Local Plan continues to set out a housing requirement of 100 new dwellings for Danbury designated neighbourhood area. Broomfield</p>

NPPF Requirement	NPPF Paragraph	Approach in the Local Plan
		is not being considered for new housing growth in the Spatial Strategy. Broomfield, East Hanningfield and Boreham neighbourhood plan areas fall within the overall strategy options for growth but a housing requirement has not been requested by these Neighbourhood Plan bodies.
Identify a supply of specific, deliverable sites for years one to five of the plan period, and specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.	68	The housing trajectory and site allocation policies meet this requirement.
Identify land to accommodate at least 10% of the housing requirement on sites no larger than one hectare; unless it can be demonstrated that there are strong reasons why the 10% target cannot be achieved.	70	The Local Plan includes sites to accommodate around 10% of the housing requirement on sites no larger than one hectare. Policy DM1 requires 5% self and custom build homes on all development of more than 100 homes. Further information will be set out in the Submission Housing Topic Paper.
Seek opportunities, through policies and decisions, to support small sites to come forward for community-led development for housing and self-build and custom-build housing.	70	<p>Policy DM1 enables the provision for self-build and custom-build homes.</p> <p>Policy DM2 provides the circumstances in which Community-led Exception Sites will be supported.</p> <p>Polices DM1 and DM2 are supported by a revised draft Planning Obligations SPD, published alongside the Local Plan documents.</p>
Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.	72	Addressed in Policy S7.
Support the development of exception sites for community-led on sites that would not otherwise be suitable as rural exception sites.	73	Policy DM2 D enables the provision of Community-led Exception Sites in non-Designated Rural Areas and the Green Wedge in specified circumstances and be supported by a revised draft Planning Obligations SPD.
Support the supply of homes through utilising masterplans, design guides and codes where appropriate to support larger scale developments.	74	Strategic Policy S7 sets out that Strategic Growth Sites require sites to be delivered in accordance with masterplans to be approved by the Council. Relevant site allocation policies refer to the need for a masterplan to be approved as a specific requirement.

NPPF Requirement	NPPF Paragraph	Approach in the Local Plan
Include a trajectory illustrating the expected rate of housing delivery over the plan period.	75	A detailed trajectory is included for the Plan period.
Be responsive to local circumstances and support rural housing developments that reflect local needs.	82	Set out in Strategic Policy S7 and Policy DM2.
Identify opportunities for villages to grow and thrive, especially where this will support local services.	83	Defined Settlement Boundaries (DSBs) allow development to come forward within villages in principle. Strategic Policy S7 allows new growth sites which are in accordance with the Spatial Principles and Strategic Policies to be allocated through relevant Neighbourhood Plans.
Avoid the development of isolated homes in the countryside unless specific circumstances are consistent with those set out in the NPPF.	84	Set out in policies including S1 and DM8

## 5. Conclusion

- 5.1. The rationale for the Council's approach to Housing to support the Local Plan is clear, compliant with national policy and well informed.
- 5.2. The relevant supporting evidence base studies and documents set out that while Chelmsford faces some constraints in meeting all housing need, there are suitable allocations and development management policies to boost housing supply and meet the requirements of the NPPF.
- 5.3. The Council's approach of using the transitional arrangements set out in the December 2024 NPPF to address local housing need and proceed with a Plan-led approach to new housing provision offers the best chance of making quick progress towards meeting a high proportion of the latest need figure, without disrupting planned supply and jeopardising sustainability objectives.



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