HS089

HEARING STATEMENT

Chelmsford Local Plan

Land Adjacent to Maldon Road, Chelmsford

Matter 8: Creating Sustainable Development

On behalf of

Barratt Redrow

Respondent I.D 1380383

October 2026

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1. INTRODUCTION

1.1 Ceres Property have been instructed on behalf of Barratt Redrow (Redrow) (Respondent I.D 1380383) to prepare this Matter 8 Hearing Statement, which has been prepared having regard to Redrow's land interests at land to the north and south of Maldon Road, Sandon, Chelmsford.

1.2 This hearing statement should be read in conjunction with Redrow's Regulation 19 response and Redrow's Focused Consultation Additional Sites consultation, November 2025 response.

1.3 Redrow have been promoting land to the east of Chelmsford and to the north of Sandon. This includes land which is allocated for development under Strategic Site allocations 3B, 3C and 3D, along with land to the east of Site 3C, which is not allocated for development, but has been promoted by Redrow for residential development as part of the emerging Local Plan. This site has a SHLAA reference of CFS99. The land not allocated for development is very well visually enclosed, being directly to the east of allocated Site 3C and to the west of the A12. To the north is Maldon Road, to the south is Sandon and the land is dissected by Brick Kiln Road. The land adjacent to Site 3C covers an area of approximately 33 hectares and is capable of delivering approximately 350 dwellings. This hearing statement provides a response to each of the Matter 8 inspectors questions, where they are appropriate to Redrow's land interests.

1.4 Since the Chelmsford Local Plan was submitted to the Secretary of State for approval, the government has now published the 2026 version of the NPPF. However, in accordance with the transitional arrangements as set out within the NPPF (2026), it is acknowledged that the emerging Chelmsford Local Plan, is being considered under the 2024 version of the NPPF.

1.5 Whilst the local plan is being considered under the 2024 version of the NPPF, the 2026 version of the NPPF is still an important material consideration, particularly given that Annex A, paragraph 2 of the NPPF is clear that development plan policies that are materially inconsistent with the national decision-making policies in the 2026 NPPF, should be given very limited weight.

2. MATTER 8: CREATING SUSTAINABLE DEVELOPMENT

This section provides Redrow's response to Matter 8. The paragraph numbering in this section have followed the Inspectors numbering within the Matters, Issues and Questions.

Issue 1 – Does the plan set out positively prepared policies relating to climate change and flood risk which are justified, effective and consistent with national policy?

Whilst the aspiration to achieve energy efficient development is acknowledged, the plan currently places a significant and stringent viability burden on new developments, that do not appear to have been fully costed. This approach is not considered to be justified, effective or in accordance with national policy. In its current form the climate change polices are inconsistent with Policy PM13 of the NPPF (2026) and the policies need amending to ensure that the policies within the plan are consistent with the NPPF (2026) to avoid them having very limited weight upon adoption.

Policy PM13 of the NPPF (2026) is clear that quantitative standards set through Development Plan Polices should adhere to the following:

b. Not to cover matters that area already addressed by Building Regulations, other than in relation to:

- Water Efficiency, for which it may be appropriate to apply the tighter Building Regulations optional requirement where justified, or exceptionally a more stringent local standard in areas of serious water stress; or
- Energy Efficiency, for which any standards that go beyond the current or proposed Building Regulations should have a clear and robustly costed rationale, which shows that there will not be an adverse impact on the viability and deliverability of the development

Redrow's response having regard to compliance with policy PM13 is set out below within our response to questions 8.5 and 8.7.

8.5 In Strategic Policy S2 and Policy DM31, are the requirements for all new buildings to be net zero carbon in operation justified by evidence, fully costed, and consistent with national policy?

No, in accordance with the requirements of Policy PM13 of the NPPF, the requirement for all new buildings to be net zero carbon in operation is not justified or consistent with national policy. It will place a substantial viability burden on new development that does not appear to have been fully assessed and costed. In this regard, this policy should either be deleted or amended to align with the requirements of the Future Homes Standards.

8.7 In part A of Policy DM25, is the requirement for all new dwellings to achieve a water efficiency of 90 litres/person/day justified and supported by evidence? Should it also apply to changes of use of dwellings?

In accordance with Policy PM13 of the NPPF (2026), the requirement for all new dwellings to achieve a water efficiency of 90 litres per person per day is not justified. In accordance with Policy PM13 of the NPPF (2026), it is recognised that the East of England is the driest region of England and therefore the optional Building Regulation Requirement of 110 litres per person per day is considered to be appropriate. Chelmsford administrative area is not an area of serious water stress and there is no justification for requiring 90 litres per person per day, which will place additional cost and could impact on the viability and speed in respect to the delivery of new development.

If the policy is adopted as currently worded, it will have very limited weight on the basis that it is not consistent with the NPPF (2026). In order to be justified and therefore sound the policy needs updating to reference a water efficiency of 110 litre/person/per day.

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