HS079

Boyer

Chelmsford Local Plan Examination: Matter 6

Hill Residential Ltd

Prepared on behalf of Hill Residential Ltd | October 26

Boyer

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1. INTRODUCTION

1.1 Boyer has prepared this Hearing Statement on behalf of Hill Residential Ltd ('Hill') in response to the Inspector's Issues, Matters and Questions for Focussed Hearing Sessions ('MIQs'). This is in relation to the examination of the Chelmsford Local Plan ('the Local Plan' / 'the Plan').

1.2 Boyer has prepared this document in response to Matter 6: 'Site Selection' as identified in Examination Document IN03 - Inspectors' Matters Issues and Questions.

1.3 Hill are promoting land at Ongar Road, Writtle for up to 240-280 homes (site refs: CFS213 and CFS214).

1.4 Hill have previously submitted representations to the Council's Regulation 19 Consultation in relation to the above site (representation number 1380379).

2. RESPONSE TO MATTER 6: SITE SELECTION

Site assessment and selection

Q6.1 What was the Council's approach to site assessment and selection? What was the process and what factors were taken into account? What evidence is the Council relying on?

2.1 Whilst it is understood that the above question is predominantly focused toward the Council to provide an answer, the following is deemed relevant to the question and consistent with matters raised during Hill's previous Regulation 19 Consultation.

2.2 Hill's previous Regulation 19 representations raised concerns with regard to the site assessment and selection process, questioning whether the range of reasonable alternative spatial strategies had been adequately assessed. The representations identified that Green Belt ('GB') sites appear to have been discounted at an early stage, with the Council relying only on available land outside of Green Belt. The concern is that, by excluding Key Service Settlements within the GB from the spatial alternatives, the Council did not test an alternative distribution of growth involving those otherwise sustainable settlements.

2.3 The Council should demonstrate how the Sustainability Appraisal and Integrated Impact Assessment (**Submission Document SD008**) assessed the potential for growth at settlements such as Key Service Settlements affected by GB designation. The Spatial Strategy and Strategic Sites Topic Paper (**Evidence Base Document TP010**) identifies "Development growth in the Green Belt" as an alternative approach but rejects it, because the Council considered sufficient and suitable land to be available outside the Green Belt. When identifying specific "Key Service and Service Settlements" which could have formed part of an alternative spatial strategy, the Council confined that exercise to settlements outside the Green Belt. This supports Hill's Regulation 19 concern that an alternative spatial strategy involving sustainable Key Service Settlements within the Green Belt was not tested.

2.4 Hill's concern is that the selected strategy should be demonstrated to be the most appropriate when considered against reasonable alternatives, including the consequences for sustainable development of directing growth away from otherwise sustainable Key Service Settlements within the Green Belt.

Issue 1 – Site allocations

General site allocation matters

Q6.7 What is the expected timescale and rate of development for the housing sites and is this realistic?

2.5 Hill's Regulation 19 representations raised concerns regarding the realistic delivery rates of the housing trajectory for strategic allocation sites.

2.6 The Council's response to the Inspectors' initial questions (**Document CC01**) (September 2026) sets out that funding for the Beaulieu Access Package, which is required to enable the Chelmsford Garden Community (6,250 homes), has now been agreed in principle by Homes England, National Highways, and Essex County Council ('ECC'). This process is being led by ECC and is expected to be finalised by the time of the Hearing Sessions. The in-principle funding agreement follows previous uncertainty regarding funding and delivery reported in the ECC's July 2026 report (**Post Submission Document PostS002**).

2.7 It is therefore requested that the Council confirms whether the assumed delivery rates remain accurate for the delivery of the Chelmsford Garden Community, in light of the ongoing work to finalise funding agreements as reported in CC01, and whether the assumed housing trajectory will need to be updated to align with those agreements.

2.8 If the assumed housing trajectory is to be updated to account for delay in securing funding agreements, it is requested that the Council confirm whether a supply of sufficient alternative sites can be identified to address any associated shortfall in housing land supply. The need for this resilience is reinforced by the Council's own Additional Sites exercise, through which 11 new sites and three expanded sites were introduced following the reassessment of the council's housing supply.

Q6.8 Are any modifications to the site policy needed for soundness?

2.9 Hill's Regulation 19 representations sought a broader approach to site allocation, including assessment of reasonable alternative spatial strategies, and full assessment of the sustainability criteria of sites within the GB.

2.10 Hill's does not seek specific modifications to the detailed policies for Strategic Growth Sites 6, 16a or 16b at this stage. However, the Council should demonstrate that the overall Plan provides sufficient flexibility to respond if strategic allocations deliver later or more slowly than anticipated and should consider whether additional sustainable allocations are necessary to demonstrate a sufficient headroom of housing land supply.

Growth Area 2 – North Chelmsford

Location 6 - North East Chelmsford (Chelmsford Garden Community) Strategic Growth Site Policy 6

f. Has it been satisfactorily demonstrated that the allocation can be delivered without causing severe impacts on the strategic and local highway network? Is further work needed, and if so how and when will this be carried out?

g. Has funding for the Beaulieu Access Package been secured? What are the timescales for its delivery, and how does this fit in with the proposed development trajectory for SGS6?

j. Is the proposed delivery trajectory realistic, having regard to identified transportation and other infrastructure requirements?

2.11 Hill's previous Regulation 19 representations did not make a direct response questioning the site-specific requirements of the Strategic Growth Policy 6 (SGSP6). The representations did, however, raise concern regarding the Plan's reliance on North East Chelmsford to accommodate the assessed housing need, and the realism of its assumed housing delivery. It is therefore considered within the scope of this hearing statement to provide the following information.

2.12 SGSP6 proposes to allocate 5,580 homes (as updated by **Submission Document SD005**), employment land and supporting infrastructure at North East Chelmsford for delivery during the Plan period (up to 2041). Alongside housing, the policy also requires the delivery of a significant provision of infrastructure, including part of the Chelmsford, North East Bypass, a new Radial Distributor Road, local centres, four new primary and secondary schools; extensions to the Chelmsford Area Bus Based Rapid Transit; works to heritage assets; drainage; habitat creation.

2.13 The complexity of the required infrastructure is compounded by delivery of the site via three separate developers, each with separate planning applications, which are pending determination with resolution to grant.

2.14 The Council's Response to Inspectors' Initial Questions (**Document CC01**) (September 2026) reports that funding arrangements for the Beaulieu Access Package have been agreed in principle, which is anticipated to be finalised by the time of the Hearing sessions. Therefore, given the ongoing work to finalise funding arrangements it is requested that the Council confirm whether the assumed housing trajectory for those sites remains accurate.

2.15 The submitted Plan anticipated delivery between 2025 and 2044. **SD005** now proposes changing the commencement year to 2027, whilst retaining delivery of around 5,580 homes by 2041. The movement in the assumed start date by two years since Regulation 19 reinforces Hill's concern that the original trajectory was overly optimistic. Hill's Regulation 19 representations relied upon evidence concerning lead-in times and build-out rates for strategic sites, together with the local delivery experience at Beaulieu Park.

2.16 The anticipated annual completions set out in the Five Year Housing Site Schedule (April 2026) (**Document LDS012**) assumes that between the years 2032/33 – 2036/37 that 1,822 homes will be built across all three Zones. **LDS012** anticipates that Zone 2 will deliver 1,680 homes during the remainder of the plan period and 670 homes post 2041 (after the plan period).

2.17 Hill previously raised concern with how realistic the anticipated build-out rates are in the submitted Regulation 19 representations and continues to maintain this concern. Research undertaken by Lichfields 'Start to Finish' (2024) provides such empirical evidence for considering housing delivery in the context of preparing local plans. The research demonstrates that the average build-out rate for sites of 2,000+ homes, the lower to upper quartile range for build-out rates is 100 to 188 dpa[1].

2.18 There are further challenges due to various complexities and uncertainties that influence developers' build-out pace, including economic fluctuations and market conditions. New build dwelling completions in England were estimated to be 143,110, a 6% decrease when compared to the year to 31 March 2025 according to the latest figures from MHCLG[2]. Research conducted by Savills[3] states that demand for homes is constrained by affordability and rising mortgage costs. At the same time, build costs have continued to rise.

2.19 It is therefore strongly recommended that the Council demonstrate that the timing of the required Beaulieu Access Package and other infrastructure requirements is consistent with the assumed housing trajectory. In addition, the Council must also explain how delayed delivery of housing land supply would be addressed. This is crucially important given the proportion of housing allocated to strategic allocations and the delivery risks identified above and as part of Hill's Regulation 19 representations.

Requested further information and evidence

2.20 The Council are requested to provide the following information:

- Confirmation of the updated status and timing of all funding commitments and delivery programme for the Beaulieu Access Package, and how these align with the assumed housing trajectory; and,
- Evidence to support the assumed housing delivery rate for North East Chelmsford GC, alongside the contingency arrangements to accommodate housing need, should infrastructure and/or housing delivery fall behind.

[1] Lichfields (2024) Start to Finish
[2] MHCLG (2026) Housing supply: indicators of new supply, England: January to March 2026
[3] Savills (2026) Further falls in housing delivery as viability becomes increasingly challenging

Growth Area 3 – South and East Chelmsford

Location 16 - East Chelmsford - Strategic Growth Site Policy 16a - East Chelmsford Garden Community (Hammonds Farm)

Strategic Growth Site Policy 16b - Land adjacent to A12 junction 18 employment area

e. What would be the impact of development of sites 16a and 16b on the strategic and local highway network, including public transport and active travel? How was this assessed? What mitigation measures would be needed to support development, and how would they be funded and delivered?

f. To facilitate development of sites 16a and 16b, will further mitigation be required at Junction 19 of the A12, over and above that already being progressed in association with the North East Chelmsford Garden Community?

k. Is delivery of site 16a, including the required infrastructure and mitigation, achievable within the timescales envisaged in the Plan? How will the timely provision of infrastructure be ensured?

2.21 Hill's Regulation 19 Representations identified significant infrastructure requirements to enable development at Hammonds Farm, which is allocated for 5,357 homes, employment, local centres, schools and supporting infrastructure at Hammonds Farm. The spatial strategy for Chelmsford and associated housing trajectory relies heavily on the delivery of 3,000 homes within the Plan period.

2.22 It is confirmed in the Council's September 2026 response (**Document CC01**) that further transport modelling is being progressed by the promoters of the ECGC, including liaison with National Highways and ECC. The response goes on to state that;

"National Highways will require further detailed modelling work to be undertaken at the planning application stages to identify suitable mitigation and confirm access arrangements to Strategic Growth Site 16a at Junction 19. National Highways will also require further design work to be undertaken at the junction to demonstrate that the mitigation and access arrangements are deliverable".

2.23 Whilst the response expects only minimal impact on the A12 and Junctions 17/19, the Council also state that further work is required at the planning application stage to confirm access arrangements and mitigation.

2.24 The Council are requested to confirm whether the remaining transport modelling, alongside the further access arrangements and mitigation work, has been reflected in the site's delivery assumptions, in addition to any measures proposed to accommodate housing need should the required infrastructure provision face unexpected delay.

j. What would be the effect of development of sites 16a and 16b on national policy requirements to ensure a long term supply of minerals?

2.25 Hill's previous representations also raised concern regarding mineral extraction and potential sterilisation. The submitted Plan recognises that the site lies within a Mineral Safeguarding Area and requires a Mineral Resource Assessment, with any sterilisation of workable resources to be addressed through the planning process. Hill's concern is therefore more specifically whether the potential requirement for prior extraction, or the evidence necessary to justify sterilisation, has been allowed for in the delivery programme for SGS16a. This is relevant both to compliance with minerals policy and to whether 3,000 dwellings can realistically be delivered by 2041.

Requested further information and evidence

2.26 The Council are requested to provide the following information:

- Further detail regarding the expected additional transport modelling work, alongside required access arrangements and mitigation work at the planning application stage, and any associated implications for the housing delivery trajectory;
- Evidence addressing mineral safeguarding and the potential for development or infrastructure to sterilise mineral resources; and,
- Evidence to support the assumed housing delivery rate for East Chelmsford GC, including the anticipated programme for masterplanning, planning permission, infrastructure delivery and first housing completions, alongside the contingency arrangements to accommodate housing need, should infrastructure and/or housing delivery fall behind.