HS028

GLADMAN

Chelmsford Local Plan Review 2022-2041

Examination

Matter 3: Strategic Priorities, Development Requirements and Spatial Principles

October 2026

Stakeholder number: 1301644

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ISSUE 1 – WHETHER THE PLAN WILL BE EFFECTIVE IN ADDRESSING STRATEGIC PRIORITIES FOR THE CLIMATE, GROWTH AND PLACE

3.1 Do the Strategic Priorities (climate; growth; and place) provide a sound basis on which to underpin the strategic policies in the Plan in order to deliver its vision?

3.1.1 As set out in our Regulation 19 response, Gladman agree with the spatial principles as drafted but consider that additional policy wording should be added to state that these will also be the starting principles for determining the suitability of a speculative application as well as to underpin plan making. In the event of a lack of housing land supply, development that accords with the spatial principles should be approved without delay to maintain the supply of much needed housing.

3.2 The Plan period is 2022 to 2041. What is the Council's anticipated date of adoption? Would the strategic policies of the Plan look ahead over a minimum of 15 years from adoption as required paragraph 22 of the National Planning Policy Framework (the Framework)? Is the approach justified, effective and consistent with national policy?

3.2.1 As it is unlikely that the Local Plan will be adopted until 2027 at the earliest, the Local Plan will only look ahead 14 years from adoption, in direct conflict with Paragraph 22 of the Framework. If it becomes apparent that further work is necessary through the examination, including the identification of additional site allocations it would seem sensible to extend the plan period as part of that work to ensure that Paragraph 22 of the Framework is complied with.

ISSUE 3 – WHETHER THE PLAN MAKES ADEQUATE PROVISION FOR HOUSING

Strategic Policy S6

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

3.3.1 No. As set out in our Regulation 19 representations, the housing requirement is derived from seeking to meet transitional arrangements of the NPPF 2023 in seeking to meet at least 80% of the NPPF 2024 derived housing requirement as opposed to an evidence-led uplift to a NPPF 2023 derived housing requirement.

3.3.2 Gladman do not consider that the figure has been justified and the plan should instead be seeking to deliver a NPPF 2024 compliant housing requirement and examined against the 2024 NPPF. The additional sites that were identified at the start of the year to address delivery issues in the early part of the Local Plan was welcomed however Gladman contend that even further sites should be identified to meet full needs compliant with the NPPF 2024.

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

3.4.1 No, there is no sound national policy compliant reason not to plan for a NPPF 2024 compliant housing requirement through this Local Plan. Failing to do so would be to artificially suppress the delivery of housing across the authority area.

3.4.2 National policy clearly identifies only a limited number of circumstances for not meeting objectively assessed needs as a minimum, and the Council is not advancing such an argument.

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

3.5.1 Yes, due to the strategy being pursued by the Council and the inherent risks associated with it, it is considered that the 20% buffer proposed at the Regulation 18 version of the Local Plan should be re-introduced and additional sites identified accordingly.

3.6 Are there particular constraints to identifying additional sites within the Plan period in the event of housing and employment development not coming forward as envisaged?

3.6.1 If it were to be identified that sites are not coming forward as envisaged it would likely mean that the Council was unable to demonstrate a sufficient level of housing in accordance with national policy and as such development would likely come forward on a speculative basis. To reduce the chance of this, further sites should be identified now.

ISSUE 4 – THE SPATIAL STRATEGY

Strategic Policy S7

3.7 The overriding strategy in the Plan is to first make use of previously developed land within Chelmsford Urban Area and then to allocate land for development in:

a. Sustainable Urban Extensions (SUEs)

b. two new garden communities, underpinned by Garden City Principles

c. expansion of existing established employment sites

3.8 Is this approach justified, soundly based and consistent with national policy?

3.8.1 No, Gladman contend that a more dispersed spatial strategy should have been pursued, to help reduce the risk associated with the delivery of the existing garden community. Adding an additional garden community, expected to commence delivery in the second half of the plan period adds further complexity to the timely delivery of housing.

3.8.2 A more dispersed strategy should have been pursued from the outset that looked to benefit from services and facilities present in existing settlements and where infrastructure is readily available.

3.8.3 Gladman welcome that the additional sites consultation sought to reduce the risk of the strategy by allocating a number of sites in existing settlements, including land being promoted by Gladman at East Hanningfield but there are still settlements that are taking no additional market housing that could easily accommodate it in locations such as Danbury, Boreham and Howe Green. In the case of Boreham, the education constraint is recognised but the omission site that Gladman are promoting, alongside

Wates, could provide the necessary infrastructure along with other benefits to the existing community.

3.9 Given the Plan's reliance on meeting development needs in the SUEs and new garden communities and taking into account their scale, is there sufficient flexibility and resilience built into the Plan to deliver the housing growth envisaged, in the event of any underperformance of these allocations?

3.9.1 No, further contingency should be built into the plan through the allocation of further sites now. Gladman are promoting a number of omission sites that are suitable, sustainable and available now that we would be happy to discuss further with the Council should they be directed to find further additional sites.

3.9.2 This is all the more important as the Council is not planning to meet full needs as would be identified using the latest iteration of national policy, and would not until the completion of a Local Plan Review. Gladman estimates this not to be for at least 5 years should this commence within 2 years of adoption of this Local Plan.

3.9.3 An alternative to identifying more sites now would be the mandating of that review to commence under the new plan making system immediately upon adoption of this Local Plan.

3.10 What alternative approaches were tested in the preparation of the Plan?

3.10.1 A response to this question is set out in our Matter 1 statement in relation to Issue 1.