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CHELMSFORD LOCAL PLAN REVIEW 2022-2041

Matter 3 Hearing Statement - Strategic Priorities, Development Requirements and Spatial Principles

Land at and adjacent to Chelmer Valley High School - Prepared by Iceni Projects

Consultation PID Number - 1397767

INTRODUCTION

1. This Hearing Statement has been prepared by Iceni Projects in respect of the Matters, Issues and Questions published for the Examination in Public into the Chelmsford Local Plan Review 2022-2041. It relates solely to Matter 3: Strategic Priorities, Development Requirements and Spatial Principles.
2. The statement is submitted in support of land promoted at and adjacent to Chelmer Valley High School (the Site)[1]. The Site is not allocated in the submitted Plan. Representations were submitted in support of the Site during the Additional Sites (Regulation 19) Consultation.
3. The Site comprises Chelmer Valley High School and its playing fields, together with adjoining arable fields. It adjoins the built-up area of Broomfield to the east and Broomfield Hospital to the north. The Site is available for development.
4. Chelmer Valley High School is in a deteriorating condition and faces challenges with retrofitting the existing building. This promoted land provides significant benefits that can be realised for the community. An indicative Development Framework Plan accompanied the Regulation 19 representations. It identifies the provision for a new six-form-entry school, dedicated SEND provision, playing fields, open space and residential development of approximately 850 dwellings. It has subsequently been clarified that the school is an 8FE (Eight Form Entry) with a Sixth Form, which would be continued.
5. We broadly support the Plan's spatial approach, including the prioritisation of suitable greenfield sites outside the Green Belt (GB) before GB release. However, to be found sound, the Plan should make additional allocations sufficient to meet the identified housing needs in full, secure a much broader range of sites and reduce overreliance on the delivery of a limited number of strategic sites.

Issue 1: Whether the Plan will be effective in addressing the Strategic Priorities for the climate, growth and place

Q3.1: Do the Strategic Priorities provide a sound basis on which to underpin the strategic policies in the Plan in order to deliver its vision?

6. Yes, the Strategic Priorities provide an appropriate broad framework. However, the growth priority will not be delivered effectively unless the Plan makes adequate provision for housing and includes sufficient flexibility to respond if major allocations underperform. Paragraph 15 of the 2023 NPPF is clear that plans should provide a positive vision for the future, including meeting housing needs and addressing economic priorities, which this Plan currently falls short of.

[1] The Site, (excluding the school) was assessed in the SHELAA November 2025 as part of a wider site (Land West of Broomfield Village Broomfield Chelmsford Essex - CFS181).

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Q3.2: The Plan period is 2022 to 2041. Would the strategic policies look ahead over a minimum of 15 years from adoption? Is the approach justified, effective and consistent with national policy?

7. No. The anticipated adoption date (of late 2026 or early 2027) is highly unlikely to be achievable, and would leave less than the minimum 15-year period sought by paragraph 22 of the 2023 NPPF. A more realistic date for adoption is the end of 2027/start of 2028. The experience of both Iceni and the Home Builders Federation (HBF) has found there to be an average of 12-18 months to adoption.
8. In order to be sound against Paragraph 35 of the 2023 NPPF, the Plan should be updated to reflect a 15-year plan period from 2028 (i.e. up to 2043), and the Council should also be allocating sites to meet the need in that plan period.

Issue 2: Spatial Principles

Strategic Policy S1

Q3.3: Does Strategic Policy S1 provide the right approach to the distribution of development?

9. Yes, the broad approach of directing growth to sustainable locations is supported. The overall Spatial Strategy of directing development to the 'Growth Areas', which are the most sustainable locations, is appropriate and in accordance with Paragraph 109 of the 2023 NPPF.
10. Policy S1 provides flexibility to direct development to appropriate sustainable locations within the Growth Areas. The land at Chelmer Valley High School aligns with this approach, being a well-connected and sustainable site within the North Chelmsford Growth Area.

Q3.4: Does Strategic Policy S1 provide a clear set of spatial principles in accordance with national policy, including in relation to the Green Belt?

11. Partially. The preference for development outside the GB is an appropriate set of spatial principles and is supported.
12. Paragraph 146 of the 2023 NPPF is clear that non-GB sites, including brownfield and underutilised land, should be explored fully, such as land at Chelmer Valley High School, prior to the release of GB land. The Plan should meet local housing need in full and, accordingly, additional suitable sites should be allocated. In applying the spatial principles and national policy, non-GB sites such as the land at Chelmer Valley High School should be prioritised.
13. Policy S1(a) should also better reflect the ability of development to make sites sustainable, rather than solely those which are already sustainable. Paragraph 109 of the NPPF is clear that significant development should be focused on locations which are or *can be made* sustainable. Policy S1 currently restricts development only to sites that are already sustainable, and is therefore unduly restrictive in meeting the needs of Chelmsford and neighbouring authorities.

Q3.6: Does it provide flexibility to achieve sustainable development through a range of site types and sizes?

14. No. Paragraph 69 of the 2023 NPPF is clear that planning policies should identify a sufficient supply and mix of sites. Our concern is that the current Plan is too dependent on three key strategic sites which have already suffered delay, recognised during the Additional Sites Regulation 19 Consultation (Paragraph 1.4), therefore putting at risk the delivery of housing.
15. The Plan should therefore provide a portfolio of sites capable of delivering a range of housing types and sizes to meet the needs of the Council, rather than relying disproportionately on a limited number of large strategic sites. A broader portfolio would also improve delivery resilience and support the demonstration of a five-year housing land supply on adoption, which is particularly important where the Plan provides for only approximately 84% of local housing need.

Q3.8: Will the policy be effective in meeting the needs of Chelmsford and accommodating unmet need from neighbouring authorities?

16. No. The Plan does not meet Chelmsford's local housing need in full, providing for only approximately 84% of identified need. In addition, unmet need from neighbouring authorities has not been appropriately considered, as discussed under Q3.15.

Q3.9: Will the Policy be effective in addressing any identified additional housing needs?

17. No. Affordable housing need is not considered to have been addressed, which is discussed under Q3.12.

Issue 3: Whether the Plan makes adequate provision for housing

Strategic Policy S6

Q3.10: Is the housing requirement of 1,210 dwellings per annum justified, evidence-based and consistent with national policy?

18. No. 1,210 dwellings per annum (dpa) equates to approximately 84% of the standard method figure of 1,437 dpa (Standard Method as of May 2025).
19. The Council undertook an additional Regulation 19 consultation to allocate further sites and ensure that the housing requirement met at least 80% of local housing need, thereby enabling the Plan to benefit from the transitional arrangements in the December 2024 NPPF. However, the Council could and should have used that opportunity to plan to meet local housing need in full.
20. Paragraph 003[2] of the Planning Practice Guidance ('PPG') states that deviation from the standard method should only be used in *"specific circumstances in which an alternative approach could be justified*". It is not considered that there are any specific circumstances which sufficiently justify an alternative or lower housing target, as proposed by Chelmsford. Whilst the Council has an area of GB to the southwest, there are significant parts of Chelmsford which are not within the GB, including land at Chelmer Valley High School. Similarly, there are no other absolute constraints (e.g. Flood Zone or National Landscapes) present at scale which would provide a robust justification to reduce the housing target.
21. In order to be sound, the Council should meet local housing need in full. The additional Regulation 19 consultation was a missed opportunity to allocate sufficient further sites. The Council should have identified sites to meet the 1,437 dpa figure relied upon for submission. The most recent Standard Method figure (May 2026) is 1,448 dpa for Chelmsford, demonstrating that, unless need is met in full, the shortfall between planned provision and identified need will continue to grow.
22. Paragraph 18 of the PPG[3] requires Sustainability Appraisals which accompany Local Plans to consider and compare all reasonable alternatives, with these alternatives being realistic and sufficiently distinct.
23. It is noted that Option 3 of the IIA proposed a growth scenario that was closest to meeting the Council's needs in full (albeit not met entirely), however this is the only option that considered such a quantum. The PPG requires Sustainability Appraisals to consider sufficiently distinct scenarios, and this should include alternative routes in which the Council's routes can be met in full. The Council's approach is therefore not justified because it failed to assess a sufficiently broad range of reasonable alternatives. These should have included, as distinct options, a strategy that meets local housing need in full, a strategy that exceeds that figure to provide a buffer for choice, competition and delivery slippage, and a strategy that also accommodates unmet housing need from neighbouring authorities.
24. The Council states in their Response to the Inspectors Initial Questions (September 2026)[4]: "*The IIA concluded that Option 3 performed more poorly overall than the submitted Local Plan (Option 2a)*

[2] Reference ID: 2a-003-20241212
[3] Reference ID: 11-018-20140306
[4] CC01

reflecting for example, greater resource use, strategic highway capacity constraints, and greater uncertainty with delivery (Assessment of Reasonable Alternatives (2) Housing page 190, paragraph 6.4.53 and Table 6.5 page 185). The Council therefore concluded that Option 2a with a housing figure of 1,210 dpa is a more sustainable strategy when assessed against reasonable alternatives".

25. A logical test for the Council would be to assess an option utilising growth in each of the 2a, 2c and 2d areas to meet their needs in full (or at least much closer to their full needs than either 2a, 2b, or 2c). They have discounted Option 3, however not considered any other options that would meet their need. As noted, the Council also failed to assess an option exceeding the housing requirement to provide a buffer for choice and competition in the market and to allow for slippage, or an option addressing unmet need from neighbouring authorities. These are further notable omissions.
26. Therefore, the Plan is not considered to be justified as it has not fully taken into account the reasonable alternatives that could be delivered and fails to account for the full housing need. The current approach is not considered to be an appropriate or sound strategy.
27. A substantial period has elapsed since the Council undertook the additional Regulation 19 consultation (November 2025), while adoption is not realistically anticipated until late 2027 or early 2028. Having reopened the Regulation 19 stage, the Council had both the opportunity and sufficient time to identify further sites and meet local housing need in full. Its decision not to do so means that the Plan is also therefore not positively prepared as required by Paragraph 35 of the 2025 NPPF.

Q3.11: Do the potential implications of using the higher Standard Method figure justify the lower figure in Policy S6?

28. No. The implications of accommodating the higher figure are not considered to justify planning for a lower housing target.
29. As noted in response to Q3.10, it is only Option 3 of the IIA that proposed a growth scenario that was closest to meeting needs in full, and was the singular Option to do so. Paragraph 18 of the PPG[5] requires Sustainability Appraisals which accompany Local Plans to consider and compare all reasonable alternatives, with these alternatives being realistic and sufficiently distinct. As such the Council are not considered to have assessed all the potential implications as they have not assessed all options available to them.
30. The justification for not considering Option 3 further (these being resource use, impact on highway capacity and greater uncertainty over delivery) is clearly not adequate justification for not meeting their needs in full via alternative options, which should have been explored further (as required by the PPG). Alternative options could have reached similar conclusions, however it is key that the Council did not undertake this exercise and settled at the singular Option.
31. It is also noted that the Council have identified part of the justification for not meeting the higher housing figure is that the Plan is at an advanced stage of preparation. Given that the Council returned to undertake an Additional Regulation 19 Consultation but continued to progress a reduced requirement, this is a flawed argument and there had been ample time to meet their needs in full at that point.
32. If inspectors were to take a pragmatic view with regard to this Local Plan and find it sound, then it is essential to require an immediate review of this Plan in order to ensure the housing needs are met in full.

Q3.12: Are there any risks to the delivery of housing as a result of the supply buffer?

33. Yes. Firstly, there is not considered to be a supply buffer as the Council have not met their needs in full.
34. Secondly, the proposed supply position is considered to be highly vulnerable, noting the delays affecting key strategic sites identified through the Additional Sites consultation and detailed within the Council's response to the Inspectors Initial Questions. The lack of buffer against the Council's identified need reduces the Plan's ability to maintain delivery if strategic sites are delayed or deliver below the anticipated rate.

[5] Reference ID: 11-018-20140306

35. The delivery of 84% local housing need is marginal over the 80% minimum requirement as set out in the transitional arrangements of the 2024 NPPF, and the supply is clearly vulnerable noting the impact of the delay of the three key strategic sites referenced within the Regulation 19 Additional Sites Consultation. Further, the affordability ratio in Chelmsford has worsened[6], with the five-year average showing the median house price is 11.34 times the median workplace-based earning, well above the England average of 7.6. It is noted that the Council have identified a historic supply buffer of between 16-18% across different Local Plan periods (Housing Topic Paper – May 2026[7], Paragraph 4.186), and it is questioned why the Council could not have sought to deliver such a buffer in this Plan to allow for sufficient headroom to ensure a five-year housing land supply at the point of adoption and throughout the plan period.

36. We would also note that there is a specific identified affordable housing need as recognised within the May 2026 Housing Topic Paper, supported by the 2023 Strategic Housing Needs Assessment (and 2024 Addendum). The identified need for 966 affordable homes for rent per annum is equivalent to approximately 80% of the total annual housing target of 1,210 homes. This is significantly above the 35% affordable housing threshold in Policy DM2. Accordingly, failure to deliver the overall housing requirement in full will materially worsen the existing affordable housing shortfall.

37. The Plan lacks sufficient flexibility and resilience to respond to under-delivery, noting its heavy reliance on a limited number of large strategic allocations. Given the acknowledged housing crisis in Chelmsford and significant affordable housing demand, the Plan should seek to reduce delivery risk wherever possible. Allocating additional deliverable sites in sustainable locations, including suitable opportunities within the North Chelmsford Growth Area such as land at Chelmer Valley High School, would provide a necessary safeguard against strategic-site underperformance and help ensure that housing needs are met in full throughout the Plan period. As noted in response to Q3.6, national policy supports a greater variety of sites, improving both delivery resilience and competition in the market.

Q3.13: Are there particular constraints to identifying additional sites within the Plan period if development does not come forward as envisaged?

38. Additional suitable sites should be identified and allocated now, rather than only after under-delivery has occurred. Deferring will only compound the existing shortfall and increase reliance on delayed strategic sites. The land at Chelmer Valley High School should therefore be identified now as an additional allocation. It is available, occupies a sustainable location, is free from overriding constraints and is capable of making a substantial contribution to housing supply alongside significant wider benefits. Its allocation would help diversify supply and support a more consistent trajectory of housing delivery across the Plan period.

39. In the context of Annex A of the 2026 NPPF, where policies in the new Local Plan are inconsistent with the NDMPs, whether wholly or partly, those policies will carry very limited weight to the extent of that inconsistency. The NDMPs will therefore provide the principal policy framework for considering sustainable development outside settlement boundaries (NDMPs S3-S5).

Q3.15: Is there robust evidence to demonstrate that unmet need from neighbouring authorities cannot be accommodated in Chelmsford?

40. No. The justification for not meeting unmet need from neighbouring authorities is not considered to be robust.

41. It does not appear from the published evidence that the Council have attempted to meet any unmet need. The SoCG with CPBC notes that Chelmsford does not have capacity as demonstrated by the IIA. As highlighted against Q3.10 and Q3.11, it is not considered that the IIA demonstrates that there is no capacity in Chelmsford. Such an assessment of whether these needs can be met has not been undertaken, and the approach is therefore unsound.

[6] Housing affordability in England and Wales: 2025 - ONS
[7] TP009

Issue 4: The Spatial Strategy

Q3.18: Is there sufficient flexibility and resilience in the Plan if the Sustainable Urban Extensions or garden communities underperform?

42. No. As set out in response to Q3.6, the Plan's reliance on three delayed strategic sites creates delivery risk and provides insufficient flexibility. Additional sustainable allocations are therefore required to broaden the supply and improve resilience. Larger sites commonly require extensive infrastructure and have longer lead-in periods.

43. Allocation of the Site would improve resilience by adding a separate source of housing supply in North Chelmsford. It would also secure a coordinated basis for the replacement of Chelmer Valley High School, dedicated SEND provision, open space and the potential improvement of parking arrangements serving Broomfield Hospital.

Q3.19: What alternative approaches were tested in the preparation of the Plan?

44. Our comments on the IIA and its failure to test realistic alternatives that meet housing needs in full are set out under Q3.10 and Q3.11 and are not repeated here.

SUMMARY AND REQUESTED MODIFICATIONS

45. The Plan's broad spatial principles are supported, but Matter 3 exposes a lack of housing provision, flexibility and resilience. The Site accords with the distributional approach in Strategic Policies S1 and S7 and would help address those shortcomings.

- Undertake a revised reasonable alternatives assessment that tests realistic and sufficiently distinct options for meeting local housing need in full, including an option incorporating the Site as promoted.

- Amend Strategic Policy S6 to provide, as a minimum, for the applicable standard method figure and thereby meet Chelmsford's housing need in full.

- Extend the Plan period to at least 15 years from the anticipated date of adoption, with corresponding provision for the additional development needs arising over that period.

- Provide a clear supply buffer, including sufficient headroom to maintain a five-year housing land supply across the plan period, and allocate a broader range and mix of sites to reduce reliance on the Sustainable Urban Extensions and garden communities.

- Allocate land at and adjacent to Chelmer Valley High School within the North Chelmsford Growth Area for residential-led development of up to 850 dwellings, a new 8FE school with Sixth Form, dedicated SEND provision, playing fields, open space and an opportunity to improve parking provision serving Broomfield Hospital. Amend Strategic Policy S7 and the Policies Map accordingly.

46. Together, these modifications would make the Plan positively prepared, justified and effective, while remaining consistent with its spatial strategy and stated preference for sustainable growth outside the GB.