HS091

Land South of Ford End Primary School
Hearing Statement prepared on behalf of Dandara Eastern
October 2026

BIDWELLS

CHELMSFORD LOCAL PLAN EXAMINATION: HEARING STATEMENT PREPARED ON BEHALF OF DANDARA EASTERN (REPRESENTATION NUMBER: 1326599)

MATTER 8 ISSUE 1

Quality Assurance

Site name:	Land South of Ford End Primary School
Client name:	Dandara Eastern
Type of report:	Hearing Statement
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Signed	
Date	20 October 2026
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Signed	
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1.0 Introduction

1.1 This Hearing Statement has been prepared by Bidwells on behalf of Dandara Eastern in support of Land South of Ford End Primary School (hereafter "the site"), which is proposed for allocation as Growth Site Policy 14b. Dandara has promoted the site through representations submitted at each of the previous Local Plan consultation stages. They control the whole site demarcated by the red line boundary plan contained in the Regulation 19 representations (Additional Sites)[1].

1.2 The purpose of Dandara Eastern's involvement in the Examination process is to demonstrate the availability and deliverability of the site, and to comment on Matter 8. These comments are based on the Regulation 19 representations under Comment ID's: **PSQ25-6294** and **PSQ25-6306** (Policies S7 and DM31).

1.3 This Hearing Statement responds to:

- Matter 8: Creating Sustainable Development
  - 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?
    - Questions 8.1, 8.5, 8.6 (b) and 8.6 (f)

[1] Bidwells Regulation 19 Local Plan Representations (January 2026): Appendix 1, Page 8

2.0 Response to Matter 8, Issue 1

Question 8.1: Is the approach to addressing climate change effective and justified? Is it consistent with national policy and the objectives and provisions of the Climate Change Act 2008?

2.1 The overarching objective of reducing carbon emissions and improving environmental performance is supported and the inclusion of policies seeking to address climate change is welcomed. However, it is important that the ambition of the Plan is balanced against the need to ensure that development remains deliverable throughout the plan period.

Question 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?

2.2 Whilst the objective of reducing carbon emissions and improving environmental performance is supported, it is unclear whether the implications of Policy DM31 have been fully costed alongside the wider infrastructure requirements placed upon development elsewhere in the Plan.

2.3 Policy DM31 appears to go beyond the standards that will be required through the Future Homes Standard. Policy requirements 1 and 3 including the requirement for predictive energy modelling and low-energy design approaches is likely to necessitate an enhanced building specification when compared to the current industry practice. The Examination should be satisfied that the associated costs have been properly assessed and that developments remain viable when considered alongside all other policy requirements.

2.4 Recent market conditions, including continued build cost inflation and slower sales rates, further reinforce the need for up-to-date viability testing to demonstrate that the cumulative requirements of the Plan can be delivered without prejudicing housing supply.

Question 8.6 (b): In Policy DM31, are the requirements for different types and scales of development proportionate?

2.5 There are concerns regarding the proportionality of Policy DM31. The policy requires major development proposals to demonstrate space heating demand through predictive energy modelling tools such as Passivhaus Planning Package (PHPP) or the Chartered Institute of Building Services Engineers (CIBSE) TM54. These approaches are different from the Standard Assessment Procedure (SAP) methodology currently used across the development industry and are likely to require a substantially enhanced design process and build specification.

2.6 The policy therefore appears to move beyond the Future Homes Standard by requiring performance standards more closely aligned with Low Energy Transformation Initiative (LETI) guidance. Whilst higher environmental standards are supported in principle, the Council should clearly demonstrate that such requirements are justified, deliverable and proportionate, having regard to viability impacts and national policy requirements.

Question 8.6 (f): Are any changes or updates to Policy DM31 or its supporting text needed for effectiveness?

2.7 To ensure the policy is effective and deliverable, flexibility may be required where compliance with all aspects of the policy would result in viability challenges. The policy should also explain how its requirements differ from the Future Homes Standard. Given the significant costs that may arise from compliance with the policy, the Examination should be satisfied that these requirements have been fully assessed within the viability evidence and considered alongside the cumulative costs of infrastructure and planning obligations required elsewhere in the Plan.

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