HS021

CERES PROPERTY

HEARING STATEMENT

Chelmsford Local Plan

Land Adjacent to Maldon Road, Chelmsford

Matter 3: Strategic Priorities, Development Requirements and Spatial Principles

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 ID 1380383) to prepare this Matter 3 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 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 (ELP). This site has a SHLAA reference of CFS99. For the purposes of this representation this land will be referred to in this representation as land to the east of Site 3C. 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. The land adjacent to Site 3C covers an area of approximately 33 hectares and is capable of delivering approximately 350 dwellings.

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. Therefore, within this representation, where reference is made to the NPPF, it is in relation to the 2024 version of the NPPF unless stated otherwise.

2. MATTER 3

This section provides a response to the Inspectors questions within Matter 3, where they are considered to be relevant to Redrow's land interests at Sandon. In this regard, numbering in this section has followed the planning inspectorates numbering within the Matters, Issues and Questions.

Strategic Priorities, Development Requirements and Spatial Principles

Issue 1 – Whether the Plan will be effective in addressing the 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?

Redrow, in principle, supports strategic priorities 1-3 and 4-9. Strategic priorities 1 and 2, which seek to address the climate change emergency and promote smart active and sustainable transport, are both strongly supported as key priorities of the Local Plan.

Redrow strongly supports strategic priority 5, meeting the need for new homes, including the recognition within strategic priority 5 that house prices within the Chelmsford administrative area are high and that there is significant demand for affordable housing.

However, for reasons explained within our response Issues 2-4, the ELP represents a missed opportunity to meet these strategic objectives. The spatial strategy as proposed does not sufficiently boost housing land supply and it also does not direct growth to the most sustainable locations. In this regard, the proposed spatial strategy is not the most suitable strategy, when considered against the alternatives and is therefore not sound in planning terms.

In respect of Strategic Priority 4, it is stated that the aim is to promote sustainable patterns of development and to protect the Green Belt. Whilst clearly the promotion of sustainable patterns of development is strongly supported, the proposed allocations within the ELP are not situated in the most sustainable locations and the plan has significant reliance on a very limited number of strategic sites. This approach is not considered to be justified or in accordance with national policy. In order to be sound, the plan should allocate land to the east of Site 3C as a very sustainable residential

allocation, which could make a substantial contribution towards housing delivery within the first 10 years of the plan.

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?

The Local Plan will be adopted by 2027 at the earliest. As a result, the Local Plan will not meet the requirements of paragraph 22 of the NPPF, which requires Local Plans to look ahead for a minimum of 15 years.

Paragraph 22 of the NPPF states that where large scale developments such as new settlements or significant extensions to existing villages or towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the timescale for development.

The ELP proposes the allocation of new settlements and large scale garden village urban extensions, including North-East Chelmsford Garden Community for 5,569 dwellings and Hammonds Farm for 3,000 dwellings. A further major allocation for 1,200 dwellings is proposed to the north of South Woodham Ferrers. These allocations clearly require a longer term vision and, in accordance with paragraph 22 of the NPPF, it is considered that there is a clear case for a longer plan period of 30 years. As a minimum the plan period should be increased to at least 20 years. The current approach is not considered to be justified, positively prepared, or in accordance with national policy and therefore it is not sound.

If the Inspectors consider that this matter is not sufficient to find the plan as a whole unsound, it is critical that an additional policy is added to the plan to require an immediate review of the Local Plan, to allow these shortcomings to be addressed.

Issue 2 – Spatial Principles

Strategic Policy S1

3.3 Does the policy provide the right approach to the distribution of development?

As set out within our Regulation 19 consultation response, whilst the Spatial Principles of new development is generally supported, these Spatial Principles have not been followed in terms of site

allocations within the plan. For example, for reasons explained in further detail in our response to IIssue 4 the ELP has not met the Strategic Policy part E requirements, in that a significant proportion of development has been situated within less sustainable locations and not all development is focused in higher order settlements. This needs to be revised in order for the plan to be sound.

In this regard, as set out within our Regulation 19 response, the land adjacent to Site 3C was promoted as part of both the previously adopted Local Plan and the ELP. Despite the land to the east of Site 3C scoring very strongly in terms of the assessment of the site within the SHLAA and it being situated in a very sustainable location, it has not been allocated for development.

Not allocating this site is a significant missed opportunity to provide a "suitable" sustainable development to complete the East of Chelmsford Strategic Growth area to the west of the A12, within close proximity to the Sandon Park and Ride, the new country park being provided as part of Site 3A, employment land being proposed at Site 3B as well as optimising and contributing to infrastructure, while also providing additional facilities to serve both existing and new communities. As such, the ELP has not been planned positively and is not justified or effective when considered against the tests of soundness.

3.6 Does it provide flexibility to achieve sustainable development through a range of site types and sizes?

No, the policy does not reference the flexibility of the benefits of achieving sustainable development through a range of types and sizes of development. This has resulted in insufficient sites being allocated as part of the ELP and an over- reliance on large strategic sites.

3.8 Will the policy be effective in meeting the needs of Chelmsford and accommodating unmet need from neighbouring authorities?

No, the policy is not currently effective in that it makes no allowance to accommodating the unmet needs from neighbouring authorities. Please refer to our answer within Issue 3 for further detail on this matter.

Issue 3 – Whether the Plan makes adequate provision for housing

Strategic Policy S6

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

No, as set out within our Regulation 19 representations, the housing requirement of 1,210 dwellings per annum is not justified and it does not accord with national policy. It is considered that there is a compelling case for increasing housing delivery in line with, as a minimum, the government's standard method for calculating housing need.

Using the standard method for calculating housing need, would require the Council to deliver a minimum of 1,433 dwellings per annum, currently the ELP only meets 84% of the required housing needs.

Chelmsford is situated in a very sustainable location, and Chelmsford City is the largest and most sustainable settlement situated in the heart of Essex. Chelmsford City also benefits from very good rail and road links to London. As acknowledged within the ELP, Chelmsford City is a location where house prices are high and there is a long waiting list for affordable housing. In addition, there is a clear unmet need from London and adjacent authorities in Essex that would clearly justify the use of a higher figure.

Therefore, in order to be sound, as a minimum the plan should meet the requirements of the standard methodology for calculating housing need.

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

No, it is not considered that the Council's reason for rejecting the higher housing figure is justified. Within the Council's response of September 2026 and the background evidence base documents, it is considered that the Council placed insufficient weight on the benefits associated with boosting housing supply, having regard to the requirements of paragraph 61 of the NPPF, which will ensure that a sufficient choice and variety of homes will be delivered.

One of the reasons for rejecting the higher growth scenario is on the basis that there is higher risk that the housing targets would not be met. This is not considered to be justified and clearly this will largely be dependent on the selection of deliverable sites to meet Chelmsford's housing needs. The Council also set out that a higher housing delivery would result in higher resource use. Whilst this may be the case, the use of higher resources would clearly be outweighed by the substantial social and economic benefits associated with boosting housing supply and delivering affordable housing within an area of acute housing needs. The use of resources can also be minimised by directing growth to the most sustainable locations and extending existing allocations, such as Chelmsford East, which would already have infrastructure in place.

In this regard, land to the east of Site 3C would benefit from the infrastructure being delivered as part of Chelmsford East and therefore would provide a sound allocation that would have a high certainty of delivery.

3.13 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?

It is considered that there is a very clear case to identify additional sites in sustainable locations. As an absolute minimum reserve sites should be allocated, which can come forward quickly in the event that the Council are not able to demonstrate a 5-year housing land supply.

3.15 Is there robust evidence to demonstrate that unmet need from neighbouring authorities cannot be accommodated in Chelmsford? What discussions have taken place with neighbouring authorities?

As set out within paragraphs 2.3-2.8 of our Regulation 19 Representations, it is considered that there is a very strong case to be made that Chelmsford City Council should be accommodating unmet need from neighbouring authorities.

Since our Regulation 19 response, the Draft London Plan has now been published, which identifies a shortfall of some 292,000 dwellings in London over the next 10 years. Accounting for its close proximity and very sustainable rail and road links to London, it is also considered that a clear case exists for Chelmsford to accommodate some of the unmet need from London.

Overall it is clear that Chelmsford need to substantially increase the rate of housing delivery in order for the plan to be justified, positively prepared and to accord with national policy.

Issue 4 – The Spatial Strategy

Strategic Policy S7: Inspectors Overview

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

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

No, whilst it is recognized that provision for Sustainable Urban Extensions and garden communities can provide significant opportunities, it is important that this is balanced with the requirements of paragraph 72 of the NPPF, which requires local authorities to identify specific deliverable sites from years 1-5, 6-10 and 11-15 of the plan period.

The Adopted Local Plan already has significant reliance on the sustainable urban extensions at Chelmsford North-East Garden Community and to the North of South Woodham Ferrers. The slow delivery of these two sites has, in part, contributed towards Chelmsford City Council not currently being able to demonstrate a 5-year housing land supply. Therefore, the proposed approach to allocate a further 3,000 dwellings at a new settlement at Hammonds Farm, is not considered sound. Hammonds Farm will require substantial infrastructure delivery and it will place further pressure on North-East Chelmsford and South Woodham Ferrers to deliver substantial housing growth in the early years of the plan.

As a result of this strategy to allocate the approximately 9,789 dwellings to just three sites, Chelmsford City Council acknowledged by their own admission, during the summer of 2025, that upon adoption of the Local Plan, they would unlikely be able to maintain a 5-year housing land supply and therefore the local plan, would not meet the requirements of paragraph 72 of the NPPF.

To address this matter, Chelmsford City Council undertook a focused Regulation 19 consultation, which proposes the allocation of a further 11 new housing sites, to provide approximately 1,592 dwellings. One of the key purposes of these additional sites was to provide sites that are capable of being delivered in the short term to meet Chelmsford City Council's 5-year housing land supply.

However, of the 11 new sites only 4 are within Chelmsford, whilst the remainder are dispersed across villages. This includes the proposal to disperse growth to tier 3, less sustainable villages such as Ford End, East Hanning field ,and Rettendon Place. The allocation of sites within these settlements does clearly not follow the Spatial Principles and Strategic Priorities in the plan and it will result in a proportion of growth being delivered in less sustainable locations, which will have high reliance on the motor car and limited employment opportunities.

In addition, Hammonds Farm is situated on the east side of the A12, which is a barrier towards transport movements from east to west and it is not considered to be the most sustainable location for growth.

By contrast, land to the east of allocation 3C is situated in a very sustainable location and could provide an extension to the allocation of Chelmsford East, which is at the top of the settlement hierarchy. The site is immediately adjacent to Sandon park and ride and it is on the west Chelmsford side A12, with ease of transport connectivity to Chelmsford City Centre. It would also have ease of access to the Country Park being delivered as part of allocation 3A and Sandon School to the south. The site is also being promoted by Redrow, a leading national housebuilder with a strong track record of delivery. As such, not including this site as an allocation has resulted in the ELP not being planned positively and is not justified or effective when considered against the tests of soundness.

Redrow consider land to the east of allocation 3C could and should support the sustainable expansion of the existing allocations in a location that is outside the Green Belt, will form an urban extension to the allocation, is free from constraints and remains suitable, available, and achievable, contributing to the options available to the Council to help meet early delivery of their increased housing need and deliver a development that is within a very sustainable location.

Its allocation would boost housing land supply, and it would reduce the reliance on the urban extensions and garden communities, and it would also assist with promoting growth to the most sustainable locations. Its allocation is required in order for the plan to align with its own Spatial Principles, to be positively prepared and to accord with national policy.

3.18 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?

No, at present there is insufficient flexibility in the plan, in the event that the SUE's and garden communities are either slow to deliver or that they do not deliver dwellings at the rate set out within the housing trajectory.

The housing trajectory for the ELP (August 2025), has a very steep step change in the trajectory. For the year 2025/2026 Chelmsford City Council forecast the delivery of 518 dwellings, however, by year 6 of the plan they are forecasting the delivery of some 2,667 dwellings. To meet this figure of 2,667 dwellings in the year 2030/2031 the City Council are proposing the delivery of some 949 dwellings within Chelmsford Central and Urban Growth Area and 950 dwellings in Chelmsford North-East Garden Community Growth Area. These assumptions are considered to be very optimistic and it is considered highly likely that this will result in the Council not being able to maintain a 5-year housing land supply.

In the last 10 years of the plan period (2031-2041) the Council are heavily reliant on the delivery of some 3,000 dwellings at Hammonds Farm. The proposals at Hammonds Farm will be subject to a complicated master planning and outline application process and it appears very optimistic that first occupations will be in 2030 as suggested in the housing trajectory. Lichfield's published a Start to Finish report in 2024 which concluded that sites over 500 homes take an average of 2 to 3 years to gain an outline consent and then between 1 and 2 years for the reserved matters to be agreed. Following this it takes a further 18 months to discharge conditions. In total the process from submitting an outline planning application to first completions takes, on average, between five and 6 and half years.

In order to address this issue, it is critical that additional sites are allocated in sustainable locations, such as land to the east of Site 3C. The land to the east of Site 3C is of a size and scale that would mean it would make a meaningful contribution towards boosting housing supply for a number of years, which would reduce the pressure on the SUE's and Garden Communities, particularly within years 4-10 of the plan. In this regard, land adjacent to Site 3C would benefit from the infrastructure already being delivered as part of the wider allocation.

At a minimum, the City Council should include the allocation of Site 3C as a reserved site, which can be delivered in the event that the housing land supply falls below 5 years. This would provide flexibility and resilience in the plan and it would secure the early delivery of additional sites in the event that they are required.

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

As set out within paragraphs 3.10-3.24 of Redrow's Regulation 19 response, at the Issues and Options Stage the Council explored the principle of growth aligned with the Adopted Local Plan allocations, including expanding some existing allocations, such as East of Chelmsford Growth Area. This strategy is clearly considered to be the most appropriate strategy when considered against alternatives, in that it would have enabled the Council to focus growth in the most sustainable locations where infrastructure is already in place. This strategy is clearly the most suitable strategy, and this should be revisited in order for the plan to be considered sound.