HS023

CHELMSFORD CITY COUNCIL LOCAL PLAN EXAMINATION IN PUBLIC.

Hearing Statement.

Matter 3: Strategic Priorities, Development Requirements and Spatial Principles

On behalf of Bloor Homes (Eastern) Consultee ID: 1329327 and 1387877

Date: October 2026 | Pegasus Ref: P22-2546

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1. Introduction

1.1. This Hearing Statement has been prepared by Pegasus Group on behalf of Bloor Homes (Eastern), in the context of the promotion of *'Land East of Main Road, Great Leighs'* and *'Land at School Lane, Chelmsford'* through the emerging Chelmsford City Council (CCC) Local Plan ((LP) 'the emerging Plan').

1.2. *'Land East of Main Road, Great Leighs'* has been promoted through the Council's Call for Sites Consultation and assigned the reference 15SLAA28. In addition, an outline planning application for up to 160 dwellings (LPA Ref: 26/00841/OUT) was submitted in July 2026 and is yet to be determined. This Hearing Statement should be read in conjunction with representations made on behalf of Bloor Homes by Pegasus Group at previous stages of the emerging Plan's preparation including Regulation 18, 19 and Additional Sites Focused Review Consultations in June 2024, March 2025 and January 2026 respectively (Consultee ID: 1329327).

1.3. *'Land at School Lane, Chelmsford'* is now being promoted by Bloor Homes following its submission through the Call for Sites process in which it was identified as *'Land South West of Broomfield Place, Main Road, Broomfield, Chelmsford'* and assigned the reference 21SHELAA101. Representations have previously been submitted for this site by Ceres Property on behalf of the Marriage Family under the site name *'Land at Patching Hall Lane, Broomfield'* with the Consultee ID: 1397877. A pre-application advice request was submitted (LPA Ref: 26/08304/PE) by Bloor Homes to the Council and a meeting held in June and August 2026 respectively for a landscape-led residential development of up to 250 dwellings.

1.4. Bloor Homes is also active in the delivery of existing sites in Chelmsford and is, therefore, a recognised and committed developer in the City area.

1.5. This Statement is prepared pursuant to Matter 3 and the associated Issues and Questions raised by the CCC emerging Plan's Examination Inspectors'.

2. Issue 3: Whether the Plan makes adequate provision for housing (Strategic Policy S6)

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

2.1. The housing requirement of 1,210 dpa equates to approximately 84% of the Council's housing need as defined by the Standard Method published in the National Planning Policy Framework (NPPF 2024 (NPPF24)). It is acknowledged that by proceeding with a housing requirement which exceeds 80% of the Government's revised Standard Method need that CCC meet with the requirements of the transitional arrangements set out by NPPF24 (Annex 1) and, therefore, the emerging LP can be examined under the December 2023 NPPF (NPPF23). Nevertheless, Bloor Homes continue to contend that this figure is not appropriately evidenced or justified. It appears from review of the Regulation 19 LP (February 2025) and Focused Consultation of Additional Sites Document (FCAS) (November 2025) that CCC have selected the housing requirement simply to satisfy the transitional arrangements. Indeed, there is little evidence as to why the Council have decided to provide for an additional 4% of their identified need above the 80% transitional requirement.

2.2. Preparation of the new Local Plan provided CCC with the opportunity to take a proactive approach to meeting the housing needs of their residents and importantly to address the City area's pressing affordability issues; as evidenced by the Council's declaration of a housing crisis in 2022, owing to a critical shortage of affordable homes to rent and rise in homelessness. According to Chelmsford's published figures in March 2026, there were 2,063 households on the Housing Register, this is an increase of 1,408 households since 2021 and 562 since 2024. This prevalent issue is again confirmed by the statistics included within the Council's Housing Topic Paper (2026). The median house price to earnings ratio in Chelmsford in 2025 was 10.74 exceeding both the regional and national averages of 9.60 and 7.47 respectively. This reflects the significant increase in median house prices as outlined by Figure 3 of the Topic Paper which confirms that for terraced, semi-detached and detached properties this has risen by 70% between 2012 and 2026. Over this same period the median price of flats has also increased by 56.7%.

2.3. The Council should, therefore, be seeking to meet their Standard Method housing need in full to help address the acute shortage of affordable housing. This is achievable given the availability of suitable sites submitted through the Council's Call for Sites process, including *'Land East of Main Road, Great Leighs'* (ref: 15SLAA28) and *'Land at School Lane, Chelmsford'* (ref: 1397877) promoted by Bloor Homes, both of which are located in areas recognised by the Council as suitable for accommodating growth. An outline planning application for up to 160 dwellings (LPA Ref: 26/00841/OUT) has been submitted in respect of the former site since the latest round of Local Plan Consultation (FCAS, January 2026) and, therefore, provides the most up to date evidence of the site's suitability and deliverability supported by advanced technical work. In respect of *'Land at School Lane, Chelmsford'* whilst the Strategic Housing Land Availability Assessment (SHLAA) identified the site for 450 dwellings, the pre-application enquiry submitted to the Council (LPA Ref: 26/08304/PE) in June 2026 following comprehensive masterplanning confirms that up to 250 dwellings with associated

green infrastructure and community benefits, can be accommodated whilst responding positively to the site's landscape features and its relationship with the surrounding neighbourhood.

2.4. Bloor Homes conclude that in the absence of further evidence and justification from the Council as to the identified housing requirement only meeting 84% of need, Strategic Policy S6 remains unsound in the context of paragraph 36b of NPPF24 and arguably is not positively prepared with consideration of paragraph 36a.

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

2.5. The Council have provided a response to the Inspectors Initial Questions dated September 2026 as part of the CCCLP examination. This response outlines that the Council have assessed a higher growth option of 1,406 new dpa, which is broadly equivalent to the full Standard Method figure, as part of the Pre-Submission Integrated Impact Assessment (IIA, January 2026) undertaken. This growth option (Option 3) assessed a higher housing figure along with additional housing allocations. The IIA concluded that Option 3 performed more poorly overall than the submitted Local Plan (Option 2a) reflecting for example, greater resource use, strategic highway capacity constraints, and greater uncertainty with delivery. The Council contend that in light of this, that the figure put forward by the Regulation 19 CCCLP of 1,210 dpa (Option 2a) *"is a more sustainable strategy when assessed against reasonable alternatives."* The Council go on to outline that given the advanced stage of the emerging CCCLP's preparation that to now try and meet the higher Standard Method figure *"would require significant delays and extra costs to the Council."* Bloor Homes as outlined in Representations in response to both the Regulation 19 CCCLP (2025) and FCAS (2026) Consultations, that the Council have had ample time to plan for the higher growth option as part of the LP making process and it is disappointing that this opportunity has not been taken; particularly given the large number of other suitable, available and deliverable sites identified by the SHLAA, including *'Land East of Main Road, Great Leighs'* (ref: 15SLAA28) and *'Land at School Lane, Chelmsford'* (ref: 21SHELAA101) promoted by Bloor Homes.

2.6. Bloor Homes contend that neither of the reasons outlined within the Council's response to the Inspectors' Initial Questions nor the outcomes of the IIA appropriately justify the lower figure in Strategic Policy S6. Instead, the Council should have undertaken a thorough review assessing whether the adverse impacts of planning for the higher growth scenario (Option 3) would have significantly outweighed the benefits.

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

2.7. Bloor Homes remain concerned by the marginal buffer proposed between housing need and supply which they consider poses a threat to delivery across the CCCLP period. Table 2 of the Council's Schedule of Proposed Main Modifications (June 2026) currently outlines a housing supply of 24,914 equating to a surplus of 8.4% above identified need (1,433 per annum). It is acknowledged and welcomed that this is an increase in the buffer of 1.4%

proposed by the Regulation 19 Local Plan (February, 2025) following the introduction of 5,427 homes through the FCAS (November, 2025). However, it remains unclear why the Council have made such a marked change from the buffer originally put forward by the Regulation 18 LP (2024) of 20% which Bloor Homes supported. A 20% buffer appears appropriate and justified based on the national objective to significantly boost housing supply and broadly aligns with the buffers historically used by CCC across previous Plan periods (16-18%), as outlined within the Housing Topic Paper (2026) at paragraph 4.185.

2.8. Furthermore, a buffer of 8.4% needs to be considered in the context of a Plan which is only delivering 84% of the housing requirement calculated using the Standard Method and a supply which is heavily reliant upon strategic sites (above 750 dwellings - 45% of supply) as well as windfall development (9% of supply); which is not guaranteed or proactively planned for by the Council. Strategic sites are often faced with significant upfront infrastructure costs and are particularly vulnerable to wider economic fluctuations. Indeed, at present the UK economy is experiencing a period of stalled growth associated with current geopolitical uncertainty resulting in elevated borrowing costs. This has led to general economic caution amongst the population with buyer hesitancy, fewer mortgage approvals and house price stagnation significantly impacting the housing market. The current economic and geopolitical environment has also resulted in increased costs for materials and labour which coupled with the introduction of new building standards and legal requirements, is also generating caution within the house building industry in the face of challenging development viability. The need for the FCAS in January 2026 resulted in part from the delay of three strategic sites identified in the Regulation 19 CCCLP (February 2025), which demonstrated the Council's housing trajectory may be overly ambitious particularly with consideration of the challenging economic climate in which these developments are coming forwards. In the absence of a more robust buffer there is a risk that housing needs will not be met.

2.9. As such the current 8% buffer is inadequate and threatens the delivery of much needed housing in Chelmsford. Therefore, Bloor Homes contend that the buffer should be increased to at least 15% to provide sufficient flexibility for the CCCLP to respond to fluctuations in committed and allocated sites. Alternatively, as a minimum the Council should provide the requisite justification for the buffer as proposed, as currently the evidence put forwards within the Housing Topic Paper (2026) only references that the NPPF does not outline a requirement for a buffer and that the supply will be monitored annually. This justification is not considered sufficient and, therefore, Strategic Policy S6 and the 8% buffer are not sound in the context of paragraph 36b of NPPF24.

3. Issue 4: The Spatial Strategy (Strategic Policy S7)

Q3.17. Is this approach justified, soundly based and consistent with national policy?

3.1. The focuses for growth in the Spatial Strategy are in themselves logical and consistent with national planning policy. However, national planning policy also requires a Plan to be supported by a robust and flexible housing trajectory; and a housing trajectory which can deliver a variety of sites, including smaller sites. Accordingly, whilst the approach to delivering growth at SUEs, new settlements and brownfield sites is sound, the over reliance on these sources of growth makes the overall spatial strategy unsound, as ultimately, it will not deliver the supply of homes identified in the Plan's housing trajectory.

3.2. The Plan's Spatial Strategy and the associated housing trajectory are proposed as part of the Local Plan which does not meet its Standard Method housing need in full.

Q3.18. 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?

3.3. The Local Plan sets a minimum housing requirement of 22,990 homes over the Plan period. To deliver this minimum figure the Modifications to the Regulation 19 Local Plan identifies a supply of 24,914 homes. This is a buffer of just 1,924 homes. It is important to note that approximately 10% of the supply relates to dwellings which have planning permission, a further 10.6% have been completed and 9.4% of the supply are accounted for by windfall sites. These sources, therefore, account for approximately 30% of the total supply of new homes.

3.4. Bloor Homes note that there are five site allocations of 750 dwellings or more, given their scale these should be regarded as strategic sites. These five sites account for 45% of the total supply and stand to deliver 11,429 dwellings. Taking a closer look, the two Garden Community proposals account for 34.4% of the total supply of new homes.

3.5. The Local Plan's supporting housing trajectory is provided in the Housing Sites Schedule (April 2026). Bloor Homes wishes to flag the following estimated delivery rates per annum and dates to the Inspector as follows:

- Chelmsford Garden Community Zone 2 – In years 2030/31 -2031/32 the site is scheduled to deliver 272 dwellings per annum (dpa) (one year of which forms part of the five-year supply associated with Plan). This delivery rate is considered to be very high. In the four year period 2037/38-2040/41 the site is timetabled at an average rate of 420 dpa. This delivery rate is not considered to be achievable.

- Chelmsford Garden Community Zone 3 – In the period 2028/29-2031/32 the site is scheduled to deliver 200 dpa. It is noted that this site provides 700 dwellings in the Council's proposed five-year housing land supply. A delivery rate of 200 dpa is considered to be very high.

- East Chelmsford Garden Community – The 2026 Housing Sites Schedule indicates that a planning application is yet to be submitted to deliver the site. The site is scheduled to deliver 120 dwellings in its first year (2030/31). These 120 dwellings form part of the Council's five-year supply. In 2031/32, delivery rates rise to 250 dpa. For the period 2032/33-2036/37 delivery rates average 206 dpa. These completion rates are very high. In the years 2037/38-2040/41 the site is then scheduled to deliver 400 dpa. This delivery rate is not considered to be achievable.

- Great Leighs - Land at Moulsham Hall – A hybrid planning application to deliver the site achieved a resolution to grant planning permission in March 2025; however, a S106 Agreement is yet to be signed and decision issued. The detailed element of this hybrid application related to infrastructure only. The site is assigned to deliver 50 dwellings in the year 2027/28, rising to 105 dwelling for the remainder of the Plan's five-year supply period. Given the need for the Council to issue a decision notice and then work with the Applicant to discharge conditions and determine Reserved Matters applications achieving completions in the year 2027/28 is considered unlikely. In addition, prior to delivering dwellings, the Applicant will also need to prepare the site and deliver the upfront infrastructure sought by the hybrid planning application.

- In addition to the above, whilst not strategic sites, Bloor Homes notes that no planning applications have been submitted at the following sites which form part of the five-year supply as identified in 2026 Housing Sites Schedule. Whilst there is potential for each site to contribute towards delivering some dwellings in the five year-period, Bloor Homes think it unlikely that they will deliver the total amount identified in the Schedule given that a planning application is yet to be submitted (thus this will then reduce the supply in the critical five year post adoption period).

    - Site Ref 312: Scheduled to deliver 175 dwellings in the five year supply period at a rate of 50-75 dpa.

    - Site Ref 310: Scheduled to deliver 150 dwellings in the five-year supply period at a rate of 50 dpa.

    - Site Ref: 292: Scheduled to deliver 140 dwellings in the five year supply period at a rate of 50 dpa.

3.6. Estimated delivery rates at SUEs and Garden Communities range from extremely ambitious to undeliverable. This point is evidenced by the estimated delivery rates at Greater Beaulieu Park (Site Ref 4-8) which run at 100-150 dpa. Indeed, various phases of the Beaulieu Park development are already under construction. In addition, Lichfield's 'Start to Finish' (2024) research found that on average schemes of 2,000+ dwelling sites have a mean delivery rate of 151 dpa.

3.7. By adopting a conservative approach to analysing the estimated delivery rates, when analysing delivery rates at Garden Communities at least 1,680 dwellings should be removed from the Plan's housing supply in the Plan period up to 2041. This deduction optimistically accepts all proposed delivery rates at the Garden Communities aside from the 420 dpa annum (x4 years) and 400 dpa (x4 years) at Chelmsford Garden Community Zone 2 and East Chelmsford Garden Community.

3.8. Bloor Homes consider it extremely likely that a significant number of dwellings over and above 1,680 will not be delivered at Garden Communities in the proposed Plan period given the 200+ dwelling per annum delivery rates proposed. The suggested deduction of 1,680 dwellings equates to approximately 7% of the Plan's supply. In this regard it should be noted that the Plan proposes an 8% buffer. There is a clear and obvious need for additional site allocations at smaller deliverable sites.

3.9. In addition, some of the delivery dates and rates identified at sites flagged in this Statement will result in a significant reduction to the Council's five-year supply position. Indeed, a five year supply is required to support an adoptable Local Plan. Again, this highlights a clear need to allocate additional sites and broaden the focus of the Plan's Spatial Strategy which is too heavily focussed on new settlements.

3.10. Bloor Homes contend that the Local Plan is clearly over reliant on the delivery of Garden Communities and Strategic sites. This over reliance will likely result in the Council not meeting its 84% of need housing target and certainly not the 24,914 put forward as a proposed supply over the Plan period.

3.11. The Council's housing trajectory is vulnerable and inflexible. There is a clear need to review the accuracy of the housing trajectory in respect of delivery dates and rates; and in turn allocate additional sites for housing to remedy the problem such as *'Land East of Main Road, Great Leighs'* and *'Land at School Lane, Chelmsford'* promoted by Bloor Homes.

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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