Martin Grant Land

# Hearing Statement

**Rep Number: 1327864**

**October 2026**

## Matter 3: Strategic Priorities, Development Requirements and Spatial Principles

**In relation to Land North East of Little Fields, Danbury**

**Pending Appeal Reference: 6012484**
**Application Reference: 25/01780/OUT**

### 1. 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?

The standard method housing figure for Chelmsford is 1,454 dwellings per annum. Martin Grant Land (MGL) acknowledge the Local Plan has come forward, under the 2024 NPPF's transitional arrangements and as result the Local Plan is required to plan for at least 80% of its housing requirement as identified through the Government's revised standard method. Notwithstanding the transitional arrangements, MGL remain disappointed with the Council's approach to planning for the delivery of new homes and meeting the housing needs of residents. The Council has had significant time to proactively and positive plan for the full standard method housing figure and had the opportunity to plan for this figure when publishing an Additional Sites public consultation in December 2025.

The need to plan positively in Chelmsford is amplified by the severe housing affordability pressures in the district. These significant levels of affordable housing need come at a time when house prices in the City Council area are significantly higher than the regional and national average and affordability ratios continue to trend upwards. Figure 3 of the Housing Topic Paper (2026) indicates that the median house price for detached, semi-detached and terraced homes has risen by in excess of 70% over the period 2012-2026, with the price of flats increasing by 56.7% in the same period. The same Paper indicates that in 2025 the ratio of median housing prices to median earnings in Chelmsford was 10.74, compared to the regional average of 9.60 and national average of 7.47.

Grant House, Felday Road, Abinger Hammer, Dorking, Surrey RH5 6QP
T: 01306 730822 E: info@martingrantland.co.uk www.martingrantland.co.uk

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Registered Office: Martin Grant Land Limited, Grant House, Felday Road, Abinger Hammer, Dorking, Surrey RH5 6QP

The Pre-Submission Local Plan and its accompanying evidence base provide little in the way of evidence to explain why the reduced 1,210 dwelling per annum target is the appropriate housing requirement for Chelmsford – other than it meets the transitional arrangements set out at paragraph 234 of NPPF. The proposed housing requirement represents a 3% increase over and above the 80% minimum requirement. There is limited evidence available to explain why the Council has chosen to plan for the additional 3% - 47 dwellings per annum.

Given the availability of suitable alternative housing sites not selected for allocation (including Land North East of Little Fields, Danbury, which could suitably accommodate up to 26 dwellings), and the acute affordable housing need, the proposed housing requirement of 1,210 requires further justification. Until further evidence is provided to justify the proposed housing requirement which meets 83% of need, Policy S6 is not considered sound in light of paragraph 36 b) of the NPPF.

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

At the Regulation 18 stage of the plan-making process the Council proposed a 20% buffer. Indeed, there appears to be logic and reasoning behind this decision given the national push to increase housing delivery and paragraph 4.185 of the Housing Topic Paper (2026) which confirms that historically the Council had applied buffers of between 16-18% to previous Plan periods.

At the first Regulation 19 consultation stage, the proposed buffer reduced to 1.4%, a surplus of approximately 300 dwellings. Clearly this buffer was inadequate and was potentially part of the reasoning as to why an Additional Regulation 19 consultation was held.

The modified Table 2 of Local Plan identifies a total supply of 24,914 dwellings over the new Plan period. This equates to a surplus of 1,924 dwellings and a percentage buffer of 8% against the proposed minimum housing requirement of 22,990 dwellings over the same period.

Given the Plan's heavy reliance on the delivery of strategic sites, Chelmsford's previous approach at Regulation 18 stage and historically relating to older Plans, an 8% buffer still seems inadequate.

The Housing Topic Paper fails to provide any real evidence of reasoning to demonstrate and justify why an 8% buffer is sufficient other that saying the NPPF does not require a buffer and supply will be closely monitored through Annual Monitoring.

In this case there is no need for the Council to potentially jeopardise housing delivery and in turn the soundness of the Local Plan by proposing an inadequate and unevidenced housing supply buffer. There are additional suitable and available sites ready to be allocated to increase the buffer and bolster the supply (Land North East of Little Fields, Danbury for example).

To allow for sufficient flexibility and likely fluctuations in the delivery of allocated and committed sites, MGL advocate that a buffer of at least 15% is allowed for in the Local Plan's housing supply

over the plan period. In order to achieve this increased buffer additional site allocations are required.

This issue is being considered in the context of a Council which has chosen not to meet its housing need in full.

Until further evidence is provided to justify the proposed 8% housing buffer or the buffer is significantly increased, Strategic Policy S6 is not considered sound in light of paragraph 36 b) of the NPPF.

3.1.3 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?

The Local Plan's housing supply is too heavily reliant on the strategic sites. The two proposed Garden Communities, make up 34% of the housing supply. A greater number and an increased variety of sites need to be allocated to support a robust and flexible housing trajectory (notably, Land North East of Little Fields, Danbury).

The application of an 8% buffer is insufficient and has not evidenced as a robust or justified approach by the LPA.

**2. Issue 4 – The Spatial Strategy**
**Strategic Policy S7**

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?

National planning policy stresses the need for strategic planning policies to provide a sufficient supply and mix of housing sites; whilst also flagging the value of identifying small and medium sized sites. Indeed, the housing trajectory supporting a Local Plan needs to be flexible and balanced to ensure it is capable of being responsive to changes over the Plan period, for example, slowing delivery rates, sites not coming forward or a downturn in the market.

The proposed Modifications to the Regulation 19 Local Plan commit to a total housing supply of 24,914 dwellings over the Plan period. Approximately 39% of this supply (9,799 dwellings) are proposed for delivery at three sites – North East Chelmsford Garden Community (5,580 dwellings), East Chelmsford Garden Community (3,000 dwellings) and North of South Woodham Ferrers (1,220 dwellings).

The updated Housing Sites Schedule (April 2026) provides the Local Plan's supporting Housing Trajectory. MGL notes the following regarding delivery rates at the two Garden Communities:

- Chelmsford Garden Community Zone 1 – 2032/33-2036/37 in this period, delivery rates rise from 150 dwellings per annum to an ambitious 195 dwellings per annum. To achieve this rate, two outlets and associated affordable housing providers need to be delivering new homes in good market conditions.

- Chelmsford Garden Community Zone 2 – In 2029/30 the site is scheduled to deliver 111 dwellings per annum. In years 2030/31 -2031/32 the delivery rate rises to 272 dwellings per annum (one year of which forms part of the five-year supply associated with Plan). This rate is considered to be very high; to achieve this rate three outlets and associated affordable housing providers need to be delivering new homes in good market conditions.

- For the five-year period 2032/33-2036/37 the site will deliver approximately 100 dwellings a year. In the four-year period that follows (2037/38-2040/41) the site is scheduled to deliver 1,680 dwellings which equates to 420 dwellings per annum. This step change in delivery and the overall quantum of 420 dwellings per annum is not considered to be deliverable. If the

site delivered at 200 dwellings per year in this four-year period 880 dwellings would be lost from the housing supply over the plan period.

- Chelmsford Garden Community Zone 3 – The site is scheduled to begin delivering new dwellings in 2027/28 at a rate of 100 dwellings per annum. To deliver 100 dwellings in the first year it is assumed that work on site to deliver infrastructure and prepare the site will begin in 2026/27, if not before. Delivery rates then rise to 200 dwellings per annum for four-year period 2028/29-2031/32. To achieve this rate two outlets and associated affordable housing providers need to be delivering new homes in good market conditions. It is noted that this site provides 700 dwellings in the Council's proposed five-year housing land supply.

- East Chelmsford Garden Community – In the year 2030/31 (which forms part of the five year supply) the site is scheduled to begin delivering completions, with 120 scheduled. To deliver 120 dwellings in the first year it is assumed that work on site to deliver infrastructure and prepare the site will begin in 2029/30, if not before.

- The following year, 2031/32, delivery rates rise significantly to 250 dwellings per annum. For the period 2032/33-2036/37 delivery rates average 206 dwellings per annum. These rates are considered to be very high; to achieve this rate three outlets and associated affordable housing providers need to be delivering new homes in good market conditions.

- In the four-year period 2037/38-2040/41 the site is then scheduled to deliver 400 dwellings per annum. This step change in delivery and the overall quantum of 400 dwellings per annum is not considered to be deliverable. If the site delivered at 200 dwellings per year in this four-year period 800 dwellings would be lost from the housing supply over the plan period.

As demonstrated by the above high-level analysis, delivery rates at the Garden Communities are in some periods very ambitious and in other periods not realistic. By adopting a conservative and optimistic approach to analysing the estimated delivery rates, a minimum 1,680 dwellings should be removed from the Plan's housing supply in the Plan period up to 2041. MGL consider it likely that a significant number of dwellings over and above 1,680 will not be delivered in the proposed Plan period.

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 and 9% of its supply from windfall sites i.e. sites not proactively planned for in terms of making site allocations. There is a clear and obvious need for additional site allocations at smaller deliverable sites.

MGL do not consider the housing supply / trajectory to be robust in the short term (first five years) or the longer term over the Plan period. Accordingly, in this regard the Plan is not sound. It is not justified, effective or consistent with national planning policy in respect of housing delivery.



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 delivery rates; and in turn allocate additional sites for housing to remedy the problem (notably, Land North East of Little Fields, Danbury).

This representation is made in the context of a Council and Local Plan which is not meeting its full housing need.