HS022

CERES PROPERTY

HEARING STATEMENT

Chelmsford Local Plan

Land off Beehive Lane, Chelmsford

Matter 3: Strategic Priorities, Development Requirements and Spatial Principles

On behalf of

BDW Homes (Eastern Counties)

Respondent Number 1380276

October 2026

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1. INTRODUCTION

1.1 Ceres Property have been instructed on behalf of BDW Eastern Counties to prepare this matter 3 hearing statement, which has been prepared having regard to BDW Eastern Counties land interests at Chelmsford Equestrian Centre, to the east of Beehive Lane, Galleywood, Chelmsford ('the Site').

1.2 This hearing statement should be read in conjunction with our Regulation 19 response.

1.3 The Site has a SHELAA reference of 21SHELAA74 and covers an area of approximately 30 hectares which is capable of delivering approximately 400-500 dwellings. The site represents a partly brownfield site and its redevelopment would secure substantial benefits associated with the redevelopment and modernisation of Chelmsford Equestrian Centre, which is a regionally important facility. The site also scored very strongly in terms of its assessment within the SHELAA, but it was not allocated for development on the basis that it is situated within the Metropolitan Green Belt. For reasons explained within this response it is considered that a compelling case exists for undertaking a Green Belt review and allocating a proportion of housing for development in the Green Belt.

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, it is acknowledged that the emerging Local Plan (ELP), 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.

2. MATTER 3

This section provides a response to the Inspectors questions within Matter 3, where they are considered to be relevant to BDW's land interests at Galleywood. 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?

BDW, in principle, supports strategic priorities 1-3 and 5-9.

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

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 objective to protect the Green Belt has resulted in growth being focused on less sustainable locations, which has exacerbated the acute affordability issues within Chelmsford's administrative area. The Council's approach to not release any Green Belt has also resulted in a lack of choice and competition for market land, which in part has contributed to the Council not being able to demonstrate a 5 year housing land supply.

For reasons explained in detail within our response to Issue 4 it is considered that there is a compelling case for a Green Belt review and allocating a proportionate level of housing to sites within the Green Belt. This should be recognised within the Strategic Priorities, in order for them to be considered as sound.

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.

It is considered that there is a clear case for a longer plan period of 30 years.

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?

Whilst a number of the Spatial Principles are generally supported, as set out within our response to Issue 1, it is considered that there is a compelling case for a Green Belt Review. This is explained fully within our response to Issue 4.

3.4 Does it provide a clear set of spatial principles that are in accordance with national policy including in relation to the Green Belt?

No, as currently worded Policy S1 does not accord with national policy.

There is no reference within the ELP to Grey Belt policy and policy S1 provides an overly simplistic approach to Green Belt policy, which does not accord with the NPPF or the NPPF (2026). In order to be sound and to accord with national policy, Policy S1 requires updating to refer to Grey Belt

development and the circumstances whereby development within the Green Belt can be considered as not inappropriate development (including previously developed land).

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.

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 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.

Chelmsford City is the largest and most sustainable settlement situated in the heart of Essex. It 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.

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. It is considered that the Council has 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 directing a proportion of growth to sustainable sites within the Green Belt.

Paragraph 146 of the NPPF is clear that one of the exceptional circumstances for the release of Green Belt land, include instances where an authority cannot meet its need for homes, commercial or other development through other means. In this instance the Council are not meeting their objectively assessed housing needs, but they have also not undertaken a Green Belt Review to identify sustainable locations where development could be directed. In the Councils response to the Inspectorate (September 2026), they set out that the higher growth assessment (scenario 3) scored relatively poorly within the Integrated Impact Assessment. However this scenario 3 proposed to direct all growth outside of the Green Belt, in less sustainable locations, with greater infrastructure constraints. A clear flaw of the Integrated Impact Assessment is that it did not consider a higher growth scenario, which included allocation of sustainable sites in the Green Belt, such as Chelmsford Equestrian Centre for development.

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?

The lack of Green Belt Review is considered to be a key constraint to identification of additional sites. Completion of a Green Belt review would assist with supporting the provision for reserve sites within the Local Plan, which could then be delivered quickly if the housing land supply position falls below 5 years.

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?

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

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, the approach set out in Policy S7 is clearly not justified or consistent with national policy.

The opening text for Policy S7 states that the Spatial Strategy applies the Spatial Principles to focus new housing and employment growth in sustainable locations. However, a number of the proposed sites for development within Policy S7 are situated within unsustainable locations that do not meet the Spatial Principles of the Local Plan and conflict with Policy S1. The Spatial Strategy appears to have had the narrow focus of protecting the Green Belt from development. This has, however, resulted in a significant flaws in the Development Plan including:

1. Allocating new development in unsustainable locations that will rely heavily on the motor car, which conflicts with the Strategic Priorities 1, 2, 4 and Spatial Principles a and e of Policy S1
2. Directing development away from the locations where affordability issues are most acute, which conflicts with Strategic Priority 5.
3. Lack of choice and competition for market land.

Paragraph 148 of the NPPF states that strategic policy-making authorities should consider the consequences of sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the Green Belt boundary. In respect to the ELP, it does not appear that this assessment as required by paragraph 148 has been undertaken, which has resulted in the Local Plan placing significant reliance on delivering growth in a limited number of urban extensions and garden communities, along with the allocation of a proportion of development in unsustainable sites in tier 3 villages outside the Green Belt.

Whilst it is recognised 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 unlike Chelmsford North East Garden Community and South Woodham Ferrers urban extension, it is not well related to an existing settlement.

It is considered that there are a number of substantial benefits related to distributing a reasonable proportion of growth to the Green Belt. In this regard, paragraph 3.24 of the ELP recognises that Chelmsford is a largely affluent area where average house prices and rents are high, sustained by high demand. Paragraph 3.25 goes onto state that ELP will need to ensure the provision for sufficient and appropriate housing to meet local housing needs. A key evidence base document in support of the ELP is the Strategic Housing Market Assessment (SHMA). Whilst the SHMA provides a detailed overview in terms of affordability trends across the City Council administrative area, it provides no assessment in terms of housing need and affordability of different settlements within the District.

As set out within policy S7 of the ELP Galleywood, Runwell, Stock and Writtle are identified as Key Service Settlements within the Green Belt and they are clearly sustainable settlements for growth. However, due to their location within the Green Belt, unlike comparable settlements outside of the Green Belt they have not had any meaningful housing growth for a period of decades, which has resulted in a very high demand for housing in these villages. This has resulted in strong disparities in house price values between settlements within and outside of the Green Belt. Table 1 below provides an overview according to Rightmove of average house prices in 2025 for Key Service Centres in the Green Belt, when compared to average house prices of Key Service Centres outside of the Green Belt:

Settlements outside Green Belt	**Average house prices (2025)**
Bricknacre	£446,895
Boreham	£416,941
Broomfield	£467,910
Danbury	£612,638
Great Leighs	£447,880
Average (total / 5)	**£478,452.8**

Settlements within Green Belt	**Average house prices (2025)**
Galleywood	£475,019
Runwell	£439,280
Stock	£1,055,825
Writtle	£521,493
-	-
Average (total / 4)	**£622,904.25**

Comparison between House Prices at Key Service Centres within and outside of the Green Belt.

As can be seen from Tabe 1, the average price of dwellings of the Key Service Centres outside the Green Belt is £478,452, whilst the average house price within Key Service Centres within the Green Belt is £622,904, which is a staggering difference of £144,452 between average house prices. Whilst addressing house prices is recognised as a key objective of the plan, the evidence base documents and ELP have not adequately addressed the clear and acute affordability issues associated with the settlements in the Green Belt. These settlements have also had very little affordable housing delivery, due to the lack of housing growth over a number of years.

To address this issue, it is critical that a full Green Belt Review is undertaken, with appropriate housing allocations within sustainable Green Belt sites. This will also have the impact of boosting housing supply and providing choice and competition for market land across the administrative area, not just in limited locations outside of the Green Belt.

This review would also provide flexibility in distributing growth to minimise the transport impact of development and it would allow growth to be focused on the Tier 1 settlements, rather than directing growth to Tier 2 and Tier 3 settlements, which are clearly in unsustainable locations.

In respect to Chelmsford City, the first Chelmsford Borough wide Local Plan was Adopted in 1997. The 1997 Local Plan sought to protect the Green Belt and did not allocate any new development within the Green Belt. Since then, the Council has published its Core Strategy and Development Control Policies in 2008, which also directed development away from the Green Belt In 2023, the current version of the Local Plan was adopted, which also did not contain any new Green Belt allocations. Therefore, over the last 30 years, Chelmsford has continually grown to the north and east in locations outside of the Green Belt. This has resulted in an uneven distribution of growth, which will be further exacerbated by the ELP. This approach is not justified, not the most appropriate strategy when considered against the alternatives and therefore not sound.

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.

In order to address this issue, it is critical that additional sites are allocated in sustainable Green Belt locations.

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

As set out above, the need for a Green Belt Review, including reviewing approaches that direct a proportionate level of development to the Green Belt, is a clear flaw of the current ELP. A robust testing of a higher level growth option, which includes allocating sustainable Green Belt sites, such as Chelmsford Equestrian Centre, Galleywood is required in order for the plan to be considered to be sound.