HS037

Hearing Statement

Matter 3: Strategic Priorities, Development Requirements and Spatial Principles

Issues 3 and 4

On behalf of Martin Grant Land

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Contents.

1. Issue 3 – Whether the Plan makes adequate provision for housing 1

2. Issue 4 – The Spatial Strategy 5

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?

1.1. 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 a perfect opportunity to plan for this figure when publishing an Additional Sites public consultation in December 2025.

1.2. 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.

1.3. 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.

1.4. Given the availability of suitable alternative housing sites not selected for allocation, the acute affordable housing need, the potential for Green Belt review in Chelmsford; 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?

1.5. 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.

1.6. 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.

1.7. 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.

1.8. Given the Plan's heavy reliance on the delivery of strategic sites (as referenced in MGL's Statement relating to Issue 3.18), Chelmsford's previous approach at Regulation 18 stage and historically relating to older Plans an 8% buffer still feels inadequate.

1.9. 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.

1.10. 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.

1.11. 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.

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

1.13. Until further evidence is provided to justify the proposed 8% housing buffer or the buffer is significantly increased, 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?

1.14. The Green Belt located within the Chelmsford local authority area has not been subject to an assessment or review for a significant period of time. The adopted 2020 Local Plan was not informed by a Green Belt review and releasing land from the Green Belt to meet the housing requirement was also rejected by the Council in the preparation of the Core Strategy and Development Policies 2008 and its Focused Review in 2013.

1.15. Whilst the Council's ambition to protect the Green Belt through the Local Plan Review process is acknowledged, MGL strongly contend that the Local Plan Review should be supported by a Green Belt review process which focuses on land which could support the proposed spatial strategy which focuses on three specific Growth Areas, including Central and Urban Chelmsford. As set out in our Regulation 18 and 19 representations, MGL believe there to be exceptional circumstances which would warrant a review of the Green Belt.

1.16. Given the matters of housing need, climate change pressures, and related corporate objectives set by the Council, MGL believe that the option of Green Belt review should, as a minimum, have been tested via public consultation and the Sustainability Appraisal process. At paragraph 6.4.30 the 2025 Integrated Impact Assessment (IIA) states that development options in the Green Belt were not pursued as there are *"sufficient and sustainable site options outside the Green Belt and Green Wedge to meet residual needs"*. MGL disagree with this conclusion for the following reasons:

- The Council has made a decision not to meet their housing need in full, without investigating Green Belt release opportunities.

- 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.

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

1.17. The Council's Strategic Housing Land Availability Appriasal (SHLAA) assesses promoted sites that are located within the Green Belt. Indeed, MGL's site at Great Baddow (Ref: Field Rear of Telephone Exchange, Church Street, Great Baddow' Reference CFS226) was subject to an assessment. MGL note that the site assessment has not been updated to reflect information submitted by MGL via both Regulation 19 consultations.

1.18. Notwithstanding the need to update the site assessment, the current assessment of the site is broadly positive in regard to the site's development potential. In addition, the site adjoins the urban area of Chelmsford, the most sustainable location in the local authority area. Despite this positive synergy with the spatial strategy and SHLAA criteria the site's Green Belt location was fatal to its potential site allocation prospects.

1.19. The Council have treated Green Belt as an absolute constraint from the outset. This has led to a reduced and vulnerable housing supply being proposed by the Local Plan.

1.20. MGL's site at Great Baddow is now subject to an outline planning application for up to 45 dwellings (LPA Ref: 26/00837/OUT). It is anticipated that that planning application will be determined in the coming months. Subject to planning conditions and in some cases planning obligations it is MGL's understanding that there are no objections to the application from statutory consultees, aside from the local Parish Councils.

1.21. The application is supported by a comprehensive Grey Belt Assessment and Landscape Visual Impact Assessment which together evidence that the site constitutes Grey Belt land and does not perform a significant role in the local or wider Green Belt.

1.22. The submission of an application evidences the availability and deliverability of the site. The positive progress of the application in terms of responses from statutory consultees evidences the suitability of the site.

1.23. In the event that the examining Inspector determines that further site allocations are required to make the Local Plan sound, MGL urge the Inspector to consider the potential of a focused Green Belt Review process which aligns with the Plan's spatial strategy. Furthermore, MGL wishes to draw their current outline planning application at Great Baddow to the attention of the Inspector. This site is suitable for release from the Green Belt or capable of coming forward as a Grey Belt site. If additional sites are required, our client's site should be allocated in the Plan owing to its evidenced suitability, availability and achievability.

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?

2.1. 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.

2.2. 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).

2.3. 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.

2.4. 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.

2.5. 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.

2.6. 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.

2.7. 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.

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

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

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