CARNEYSWEENEY

HS048

PLANNING AND REGENERATION

Hearing Statement
Matter 4 – Infrastructure and Transport



Client Name: Hammonds Estates LLP and Wates Developments

Site Address: East Chelmsford Garden Community (Hammonds Farm)

Date: 21 October 2026

Chelmsford Local Plan Review Examination

Representor ID: 872955
On behalf of: Wates Developments Ltd and Hammonds Estates LLP
Date: 21 October 2026

Issue 1 - Whether the planned infrastructure aligns with the planned housing and economic growth

Question 4.1 - Are there any consequences for the delivery of housing arising from the cancelling of the A12 widening scheme?

1.1.1 The DCO scheme extended approximately 24km between A12 Junction 19 (Boreham Interchange) and Junction 25 (Marks Tey Interchange), with its principal relevance to Chelmsford being the proposed improvements at Junction 19. Earlier evidence within TN006 assumed these improvements were required and would be delivered through the DCO; however, subsequent work has secured an alternative package of Junction 19 mitigation through the Beaulieu Access Package (BAP), which now forms the basis for planned growth.

1.1.2 At Junction 19, a number of enhancement schemes have either been delivered or committed. Improvements associated with the Beaulieu and Channels developments were implemented in 2021 and are now operational. The BAP has been consented and funded, providing the improvements necessary to support growth at the North-East Chelmsford Garden Community (Site 6). Should further mitigation be required in future, this could include improvements such as widening of the A12 southbound off-slip. Enhanced walking and cycling connections are proposed in association with Site 16a.

1.1.3 To improve active modes accessibility to Beaulieu Park Station, the Council has included Payne's Lane bridge, previously included within the DCO, within their Infrastructure Delivery Plan (IDP). This is not infrastructure on which site 16a relies upon, nor necessary mitigation (see SOCG49A).

1.1.4 These elements are shown indicatively in Figure 1, which identifies the committed BAP works (pink), potential future southbound off-slip improvements (black), Payne's Lane active modes bridge (blue) and components of the cancelled DCO scheme which are not currently considered necessary to support delivery of Site 6, Site 16a or the wider Local Plan Review growth (red):

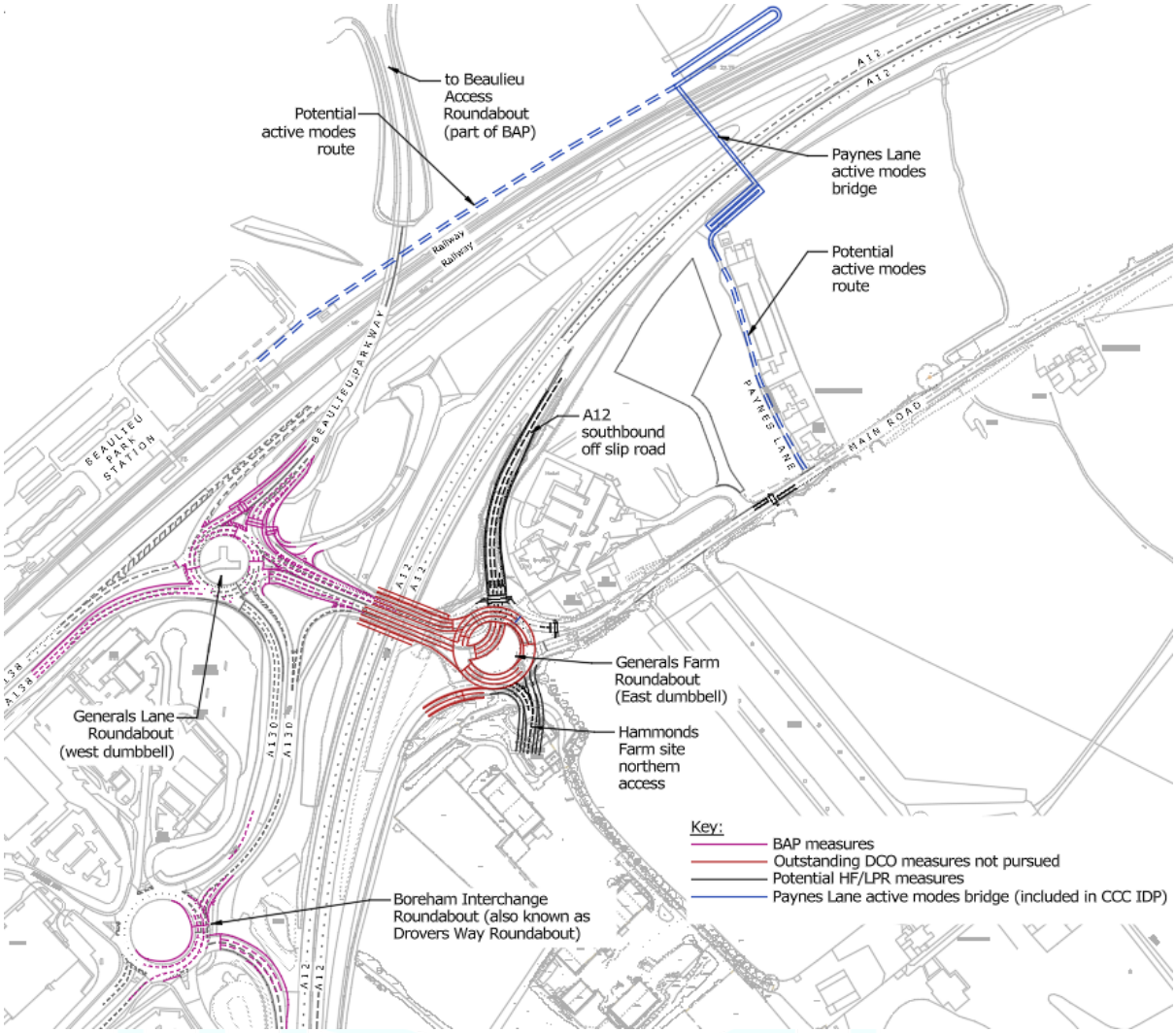


Figure 1 – Overlay of planned J19 works

1.1.5 As recorded in SoCG33, all parties agree that Junction 19 has existing capacity constraints and that mitigation is required to support strategic growth (p2, final paragraph). Following cancellation of the A12 J19-25 DCO scheme, an alternative package of Junction 19 improvements has been accepted and progressed to an appropriate level of design. Funding is expected to be secured through a combination of developer contributions, Homes England, Essex County Council and National Highways.

1.1.6 Accordingly, whilst cancellation of the A12 widening scheme removed the prospect of wider corridor improvements, the available evidence does not identify any housing allocations that would become undeliverable as a consequence. The Council, Essex County Council and National Highways agree that the current Local Plan evidence demonstrates that strategic growth can be accommodated through the committed Junction 19 improvements, with any site-specific modelling or additional mitigation requirements being addressed through subsequent planning applications. National Highways has also acknowledged that the traffic flow impact of Hammonds Farm at Junction 19 is relatively limited (SoCG33, Table 2, 'Agreed response to Rep Number PSQ25-6446'), reducing the likelihood that

significant additional mitigation will be required, particularly if connections to Junction 19 are focused on active and sustainable travel modes.

Question 4.2 - There is currently no confirmed delivery timescale for sections 1b and 2 of the Chelmsford North East Bypass. Are there any consequences arising from this for the delivery of housing?

1.1.7 The strategic modelling work undertaken by ECC at pre-submission stage, (T006a, Key Modelling Assumptions, Page 12), indicates that the modelling assumes the delivery of section 1a only within the LPR period. The conclusions of the strategic modelling, and the subsequent microsimulation modelling based on the strategic outputs, which allow for the traffic generation estimates of both existing allocations and those sites assessed within T006a, therefore do not rely on sections 1b and 2 and hence there are no consequences.

Question 4.3 - Will the proposed improvements at Junction 19 of the A12 set out in the Beaulieu Access Package, be sufficient to deliver the strategic growth in the Plan and achieve sustainable/active travel requirements?

1.1.8 The BAP will facilitate growth at NECGC up to a total of circa 10,000 dwellings. Further measures at J19 would be provided in association with Site 16a and the Local Plan Review, as outlined in the response to Question 4.1 above. Together, these committed and proposed measures will be sufficient to deliver the sustainable/active travel requirements through the inclusion of enhanced access to Beaulieu Park station, with an emphasis on active modes (active modes crossings/routes) and new/enhanced public transport (high-quality bus services) to promote travel by sustainable modes.

<u>Strategic Policies S9, S10 and S16</u>

Question - 4.4 Does the Infrastructure Delivery Plan March 2025 (INF012) contain the full range of infrastructure to support planned growth and how will it be kept up to date?

1.1.9 Yes. INF012 identifies the full range of infrastructure currently known to be required to support the planned housing and employment growth in the Local Plan, covering transport, utilities, education, health, community facilities, green infrastructure and other supporting services. The document is recognised as a “snapshot in time” and will be kept under review through ongoing engagement with infrastructure providers, updates to infrastructure schedules and monitoring through the Council’s Infrastructure Funding Statement process. However, INF012 acknowledges that Wates has prepared a separate IDP for Site 16a and that the detail of the infrastructure required for Site 16a will be captured within this site-specific IDP, given that it handles direct infrastructure delivery as well as whole plan developer contributions. A version of this site-specific IDP was submitted at Regulation 19 stage (Rep PS25-242) and further iterations will be approved at masterplan and planning application stages. The Infrastructure SoCG (SOCG049A) sets out the current agreed position between the Council and Wates on the infrastructure known to be required to support Site 16a.

Question 4.5 - Do the costs and funding/delivery sources in the Infrastructure Delivery Schedules (INF012 Appendix A) align with those of key service and infrastructure providers?

1.1.10 Yes. The costs, funding assumptions and delivery responsibilities in Appendix A of INF012 generally align with information provided and verified by key service and infrastructure providers through stakeholder engagement. However, where providers could not supply detailed cost estimates, the Plan relies on indicative benchmark costs prepared by Arup. The Council therefore presents the schedules as the best available evidence at the time of publication, while recognising that costs, funding sources and delivery programmes will need to be updated as infrastructure providers' plans evolve.

Question 4.6 - Will Strategic Policy S9 be effective in securing new and improved infrastructure and are modifications necessary for soundness?

1.1.11 Strategic Policy S9 is sound and effective. It provides a clear framework requiring development to be supported by the infrastructure, services and facilities necessary to meet its needs, whilst allowing the precise scope, timing and delivery mechanisms to be refined through ongoing IDP work and subsequent planning applications. The supporting evidence demonstrates that infrastructure requirements have been identified to an appropriate and proportionate level for plan making purposes, with further detailed assessment to be undertaken at the application stage. Accordingly, Strategic Policy S9 is justified, effective and consistent with national policy.

Question 4.7 - Is Strategic Policy S16 sufficiently clear in what it requires new development of varying sizes to provide? Will it be effective in achieving its objectives?

1.1.12 The core purpose of Strategic Policy S16 is to ensure the delivery of sustainable placemaking in the context of sustainable travel by focusing on the prioritisation of active and public transport opportunities, hence reducing car dependency.

1.1.13 Part A of the policy sets out that all new development proposals "...'must' be designed to prioritise and maximise opportunities for active and sustainable transport and movement". The wording of this policy is clear that this is an essential policy requirement and not aspirational. This policy is supported by the wording of the NPPF and hence can be robustly defended in the context of decision making.

1.1.14 Part B of the policy relates specifically to 'strategic scale development' (100+ dwellings or 1,000+ sqm) and requires development proposals to demonstrate how they have considered the achievement of their respective place-making objectives (i.e. provide evidence that the vision of the proposals can realistically be delivered). This is an absolute requirement for all strategic development which can be expected to be applied to each respective development in a manner that is proportionate and appropriate to the relative scale and opportunity presented. This again is supported by the applicable NPPF policy wording. Whilst it is not practical to be prescriptive, a clear requirement is set which is specifically relevant to Site 16a "The two Garden Communities are required to achieve a 60% modal shift to sustainable and active modes of travel".

1.1.15 The Transport and Connectivity Strategy for Site 16a (Rep PS25-242) is centred around the need to significantly reduce car dependency and target the shift to 60% by sustainable modes through the provision of comprehensive measures to facilitate and promote travel by active modes, public transport and other means such as mobility hubs and car share schemes. See Matter 6 Site 16a Question 6(g).

Question 4.8 - Will the practical application of Policy S16 be effective? Are main modifications necessary for soundness?

1.1.16 The exact requirements for individual sites must remain a matter of appropriate and reasonable judgement, following detailed consideration of constraints and opportunities. The zonal approach promoted by the Council provides an indication of the overarching strategy to be adopted based on the applicable zone type. The wording of applicable NPPF policies support this strategic local policy, ensuring that it can be implemented and defended effectively at the application/decision-making stage.

Question 4.9 - Does the Plan provide sufficient flexibility of delivery mechanisms for necessary infrastructure. What is the role of the Community Infrastructure Levy (CIL) and s106 in that delivery?

1.1.17 The Plan provides a flexible framework for infrastructure delivery, drawing on infrastructure provider investment, public funding, CIL and site specific s106 obligations. CIL has an important role in funding strategic infrastructure across the authority area, while s106 remains the primary mechanism for securing infrastructure necessary to mitigate the impacts of individual developments. The IDP recognises that funding availability will evolve over time, thereby providing a realistic basis for ongoing infrastructure planning and delivery. The Infrastructure Needs SoCG (SOCG049A) also recognises that consideration will be given to ringfencing CIL or the use of other bespoke infrastructure mechanisms to help fund the infrastructure required to support the delivery on this proposed allocation if, when the scope, phasing and cost of the infrastructure is updated, the Council is satisfied that the proposed development cannot viably be supported by the delivery methods indicated in this SOCG. The ringfencing of CIL would require revisions and corporate agreement to the Council's Allocating and Spending CIL Governance document.

Question 4.10 - Are there potential cumulative effects from the various mechanisms for placemaking, transport and financial contributions through s106 planning obligations and CIL that might affect the delivery of Site 16a East Chelmsford Garden Community? Is the approach to these costs justified and soundly based?

1.1.18 Whilst a range of placemaking, transport and wider infrastructure obligations will be sought from Site 16a through a combination of CIL, s106 obligations and direct delivery requirements, these measures are all identified as necessary to mitigate the impacts of development and support the vision for Site 16a. There is no evidence that the cumulative cost or delivery burden would prejudice the deliverability of Site 16a beyond that acknowledged in the Council's own viability testing. The approach is justified through the IDP, the site-specific Infrastructure Needs SoCG and ongoing viability assessment, with the

precise scale and timing of contributions to be tested and secured through the planning application process.

1.1.19 The cumulative cost of the infrastructure, placemaking and mitigation measures associated with Site 16a has already been factored into the Council's viability testing and tested through the infrastructure costs identified through the Infrastructure Needs SoCG (SOCG049A). The Council has also assessed viability of the planning obligations through the Local Plan Viability Update 2026 Further Update Note (V003) which confirms that the site generates a Residual Land Value well above the Existing Use Value and close to the target Benchmark Land Value (paragraphs 9.14 to 9.18). As indicated at paragraph 9.15 to the Viability Update, the viability appraisal allows for payment of CIL totalling c.£63m and confirms that, should it be necessary, a proportion of this CIL could be reinvested back into the scheme, in effect acting as a buffer to address any viability issues which arise post adoption of the plan.

1.1.20 The deliverability of the planning obligations package is further supported in Paragraph 5.3 of the Infrastructure Needs SoCG (SOCG049A) where it is agreed that consideration will be given to ringfencing CIL or the use of other bespoke infrastructure mechanisms to help fund the infrastructure required to support the delivery on this proposed allocation if, when the scope, phasing and cost of the infrastructure is updated, the Council is satisfied that the proposed development cannot viably be supported by the delivery methods indicated in the SOCG. The out-turn of this agreement marked in the SOCG is our proposed modification to Supporting Paragraph 6.107, detailed at Paragraph 11.1.7 and 11.2.1 of our representations (Rep PS25-324). We consider this modification is necessary to make the policy effective i.e. sound.

1.1.21 The approach is justified because the costs have not been identified arbitrarily but flow directly from evidenced infrastructure requirements necessary to support the allocation. It is soundly based because those requirements have been informed by the IDP process, infrastructure provider engagement, the Infrastructure Needs SoCG and the Council's viability evidence. The approach also provides sufficient flexibility to respond to changing cost assumptions and funding opportunities over the plan period, whilst maintaining confidence that the necessary infrastructure can be delivered alongside development.

1.1.22 Consequently, and acknowledging the potential for re-use of CIL to fund infrastructure, there is no evidence that the combined effect of these requirements would undermine the deliverability of the allocation and the site remains capable of supporting the necessary infrastructure interventions.

Issue 2 - Transport

Question 4.12 - Do the Transport Impact Appraisals December 2024 (T006) and October 2025 (T007) provide a clear picture of the effects of housing and economic growth on the transport network and the mitigation required?

1.1.23 Yes. T006 and T007 provide a clear and proportionate strategic assessment of the transport effects of planned housing and employment growth, identify the principal areas of network stress, and set out the broad package of mitigation required to support the Local Plan. However, they remain strategic planning documents rather than detailed delivery or implementation plans and therefore leave some matters to be resolved through master planning and planning application stages. Through these processes, detailed modelling such as through microsimulation would be introduced to provide further certainty around the findings. National Highways, Essex County Council and the Council agree that the Local Plan and its accompanying highways evidence base are suitable for Local Plan purposes and have indicated that based on the "extensive modelling completed to date" that there are no modifications required to the Plan (SoCG33, Table 2) and that any outstanding elements of the modelling and assessment can be completed through the subsequent planning applications (SoCG33, Table 4).

1.1.24 In response to National Highways' earlier concerns, significant additional modelling has been undertaken for Junctions 17, 18 and 19, including third-party microsimulation modelling commissioned in relation to Hammonds Farm. As recognised within the Councils' SoCG (SoCG33), this work has informed the assessment of Strategic Road Network impacts and will continue to be refined through future planning applications. National Highways' earlier recommendations in relation to T006, specifically the need for more detailed microsimulation modelling, have therefore been satisfied through the work reported in the Wates' Regulation 19 representations. All parties agree that further detailed modelling using the same approach requested by National Highways (i.e. microsimulation modelling) will be undertaken in support of the Hammonds Farm planning application submission.

1.1.25 Both TN006 and the microsimulation modelling completed for Regulation 19 representations demonstrates that future congestion on the A12 is principally driven by background traffic growth and already adopted / committed development rather than specifically Hammonds Farm or other Local Plan Review allocations (see TN006, p13 bullet 1; SoCG33 p2 final paragraph, and Hammonds Farm Rep PS25-242 'Traffic Modelling Overview Report'). TN006 (p59, first paragraph) identifies Hammonds Farm (Site 16a) and Land Adjacent to A12 J18 (Site 16b) as the only allocations generating traffic flows of sufficient scale to materially affect the network, with impacts focused on Junction 18 and the A414 corridor. The Hammonds Farm Regulation 19 traffic modelling (Rep PS25-242) also identified Junction 18 as the key network constraint, with significant queueing forecast even in the absence of Local Plan Review traffic. The modelling demonstrated that the proposed Junction 18 improvements provide substantial benefits by reducing queues, improving network resilience and protecting the strategic function of the A12. A proportionate level of assessment has therefore been completed to support the Local Plan and all parties recognise the need for further modelling work at the planning application stage to further develop the mitigation proposals to avoid potential impacts on the Strategic Road Network (SoCG33).

Question 4.14 - How will the Plan achieve the aims of the three Strategic Zonal Focuses developed by Essex County Council?

1.1.26 Each of the three Chelmsford zone classifications (Central, Mid and Outer) has an identified overarching access strategy that is appropriate to the level of opportunities and constraints that apply to that zone. In the context of sites 16a and 16b, which are currently located within the 'Outer' zone, the vision is to pursue the significant level of opportunity for travel by sustainable modes through targeted investment in sustainable infrastructure and associated mode shift away from the private car (which is in keeping with the 'Mid' zone strategy). This therefore results in a notional extension of the 'Mid' zone.

Question 4.15 - How will localised cross boundary/cumulative impacts be assessed and how will mitigations be delivered?

1.1.27 The strategic modelling undertaken by ECC (T006a and T007) includes specific assessment of the potential for cross boundary impacts. Mitigation is expected to be delivered in the form of bespoke measures provided by NECGC (such as the BAP) and Hammonds Farm (as described above) in particular, in combination with the targeted 60% sustainable mode share which applies to both developments.