CHELMSFORD LOCAL PLAN EXAMINATION

MATTER 4

HEARING STATEMENT
On behalf of
(1) LITTLE BADDOW PARISH COUNCIL
(2) BOREHAM PARISH COUNCIL
(3) DANBURY PARISH COUNCIL
(4) SANDON PARISH COUNCIL

[Regulation 19 Reference: Person ID 1360095; Site 16A Comment IDs PSQ25-6174, PSQ25-6176 and PSQ25-6177]

A. INTRODUCTION

1. This Hearing Statement is submitted on behalf of Little Baddow, Boreham, Danbury and Sandon Parish Councils ("**Parish Councils**"). The Parish Councils objected at Regulation 19 through a representation prepared by Walsingham Planning (March 2025), accompanied by technical notes from Stomor. They objected to Strategic Policies S6 and S7 and Strategic Growth Site Policies 16a and 16b. Their case is that the allocation of Hammonds Farm (SGS16a) makes the Plan unsound. Measured against paragraph 35 of the NPPF (2023), reliance on SGS16a is not justified or effective on the present transport and infrastructure evidence. SGS16b is addressed where it adds cumulatively to effects on the A414 and A12 Junction 18.

2. The Parish Councils have obtained technical highways advice from John Russell Transport Planning ("**JRTP**") following new evidence confirming the cancellation of the A12 widening scheme. The conclusions of JRTP on the impacts of the cancellation are set out in Section B below. Section C addresses the Inspector's questions by reference to that evidence and the Local Plan evidence base.

B. TECHNICAL TRANSPORT EVIDENCE – JOHN RUSSELL TRANSPORT PLANNING

Strategic justification for Hammonds Farm (SGS16a), including cumulative transport effects with SGS16b, following cancellation of the A12 scheme

JRTP.1 The strategic justification for allocating Hammonds Farm for approximately 3,000 homes needs to be considered in the context of the transport infrastructure anticipated when the growth strategy was developed. The site lies in open countryside, separated from Chelmsford's existing urban area by the A12. Existing public transport provision is limited, and opportunities for everyday journeys by sustainable modes are relatively poor. The site's location therefore presents inherent challenges in achieving sustainable accessibility.

JRTP.2 Against that background, the proposed A12 widening scheme provided an important part of the strategic rationale for selecting this location. The approach appears to have been to make best use of planned improvements to the strategic highway network, while seeking to mitigate the site's locational disadvantages through a package of walking, cycling and bus connections. However, the A12 creates a significant physical barrier between the site and Chelmsford's existing urban area and facilities, while existing public transport provision is limited. The proposed sustainable transport measures therefore start from a position of relative disadvantage and, even when delivered, may achieve no more than a moderate level of sustainable accessibility. Paragraph 108(b) of the 2023 NPPF is relevant because it requires opportunities from existing or proposed transport infrastructure to inform decisions about the scale, location or density of development that can be accommodated.

JRTP.3 The cancellation of the A12 scheme in July 2025 materially changes that context. The allocation retains its inherent disadvantages in terms of sustainable travel, while the planned highway improvements that formed part of the strategic context for selecting this location are no longer proceeding as anticipated. This is particularly significant given the Council's evidence that improvements at Junction 19 were required, as a minimum, to accommodate the strategic growth proposed in the adopted Local Plan and its review, and that capacity problems already existed before that planned growth was added.

JRTP.4 The proposed active-travel bridge and bus connection across the A12 are acknowledged. However, they should be regarded as the minimum infrastructure necessary to overcome the physical severance created by the A12, rather than as evidence that the site will be well served by sustainable transport. Providing a means of crossing the A12 does not, in itself, establish that onward journeys by bicycle or public transport will be sufficiently direct, convenient and attractive to offer a realistic alternative to the private car. The Council therefore needs to demonstrate how the wider routes and services will make sustainable travel an attractive and practical choice, rather than merely a possible one.

JRTP.5 Separately, the cancellation of the A12 widening scheme removes anticipated highway improvements that formed a critical element of the allocation's strategic transport context. The additional traffic generated by approximately 3,000 homes will still need to be accommodated, notwithstanding the loss of those improvements. Given the evidence that the existing network—including Junction 19 and the mainline A12, particularly at the merges—already faces capacity constraints, it is unknown how the resulting demand will be accommodated or what funded and deliverable alternative mitigation will be provided. The Council should therefore demonstrate that the allocation can be accommodated on the highway network that will actually be available, rather than relying on improvements that are no longer proceeding as anticipated.

JRTP.6 The concern is therefore twofold. First, a strategic allocation such as this generates a mass demand for sustainable travel for which a mass transit system is required. Can the proposed walking, cycling and bus infrastructure overcome the site's locational disadvantages sufficiently to make sustainable travel genuinely attractive, including to residents who might otherwise travel by car? Secondly, and separately, can the strategic road network accommodate the additional demand generated by the allocation without the anticipated A12 improvements? The proposed bridge and bus connection may help address the physical barrier to sustainable travel, but they do not resolve the wider highway-capacity issue. Taken together, these matters raise a fundamental question as to whether the strategic case for locating development of this scale at Hammonds Farm remains justified following the cancellation of the A12 scheme.

Current position

JRTP.7 The April 2026 Statement of Common Ground between Chelmsford City Council, Essex County Council and National Highways confirms that the alternative Junction 19 improvements currently being progressed are principally intended to support North Chelmsford Garden Community, including the Chelmsford North East Bypass and Northern Radial Distributor Road. The package is intended to enable further development in a growth area where housing and supporting infrastructure have already been delivered or progressed, including Beaulieu Park railway station and sections of the planned road infrastructure. It should not, therefore, be assumed that the interim scheme represents a comprehensive solution to the transport impacts of all proposed strategic allocations.

JRTP.8 The authorities acknowledge that further modelling and design work is required to establish whether Hammonds Farm would necessitate additional mitigation

beyond that package, including to confirm the site's access arrangements and the deliverability of the necessary works. Although the modelling to date indicates relatively low additional flows from Hammonds Farm at Junction 19, its main access to the Strategic Road Network is expected to be at Junction 18, where the authorities also identify outstanding modelling requirements. This is significant because currently, the traffic modelling in T006 assigns Hammonds Farm residential traffic approximately 70% via the A414/Junction 18 to the south and 30% via Junction 19 to the north. The consequence of reduced capacity at Junction 19, both at the junction and on the main line as a consequence of the A12 scheme being cancelled, is likely to be an even greater reliance on Junction 18 for traffic travelling to and from Hammonds Farm.

JRTP.9 The possibility of additional mitigation, including widening the A12 southbound off-slip at Junction 19, is identified, but the published evidence does not establish that the necessary Junction 18, Junction 19 and mainline mitigation has been confirmed, funded and demonstrated to be sufficient for Hammonds Farm.

Junction 18 and cumulative development at Columba Park

JRTP.10 The emphasis on Junction 19 should not obscure the more immediate role of Junction 18. The current traffic modelling set out in T006 assigns Hammonds Farm residential trips to the road network on a roughly 70/30 split via A12 Junction 18/A414 to the south and Junction 19 to the north respectively. It also records that Hammonds Farm and the land adjacent to A12 Junction 18 are the two allocations shown in the modelling to generate traffic flows of sufficient volume to affect traffic conditions significantly on the routes considered. Junction 18 and the A414 are therefore central, rather than secondary, to the transport implications of SGS16a.

JRTP.11 The cumulative position at Junction 18 has also become more important as the details of SGS16b/Columba Park are coming forward through Reserved Matters applications. This includes Unit 300 (26/01077/REM), an 11,023 sqm Class B8 last-mile distribution facility proposed to operate on a 24-hour basis, with 673 delivery-van storage spaces, 72 van loading bays and 214 employee car spaces. Parallel Reserved Matters applications bring forward further parts of the same outline development. These proposals share the A414/Junction 18 corridor with the majority of traffic assigned from SGS16a. This forms just part of the whole 46,605 sqm development but provides real world evidence regarding the expected traffic demand arising from commercially viable uses at allocation 16b, rather than

theoretical assumptions about facilities. This expected traffic demand should be included in the local plan transport assessment tests.

JRTP.12 For the Local Plan examination, the significance is cumulative. A committed employment/logistics development is now coming forward immediately adjacent to Junction 18 which can provide real world traffic forecasts. At the same time, the Council's own modelling outputs which have hitherto identified 30% of traffic assigning to Junction 19 are questionable given the cancellation of the A12 widening and associated improvements at Junction 19, with a higher proportion of traffic likely to assign via Junction 18.

JRTP.13 The assessment of SGS16a should therefore demonstrate how the combined demand from SGS16a, SGS16b and background growth can be accommodated at Junction 18, on the A414 and on the A12 mainline, including any resulting displacement onto the surrounding local road network. That question should be resolved at the strategic plan stage to the extent necessary to demonstrate that the allocation is deliverable, rather than being left wholly to later planning applications.

JRTP.14 There is also a material qualification to the modelling itself. In SOCG033, Table 4, National Highways identifies limitations in the updated base model's representation of A12 mainline congestion and merge/diverge behaviour. The modelled journey times are reported to be significantly faster than those observed, indicating that existing mainline congestion is not adequately captured. Although the model is accepted for assessing impacts on the A12 off-slip roads at Junctions 17–19, National Highways calls for further assessment of mainline effects and updated forecast modelling. Given the cancellation of the wider A12 scheme and the acknowledged existing capacity constraints, it is important to establish whether these limitations affect the reliability of the evidence supporting the allocation, rather than leaving their implications to be resolved only after the strategic decision has been made.

Conclusion

JRTP.15 The strategic case for allocating Hammonds Farm for approximately 3,000 homes was developed in the context of the proposed A12 widening scheme, which offered an opportunity to align strategic growth with planned improvements to the highway network. However, the site's location in open countryside, separated from Chelmsford's urban area by the A12 and with limited existing public transport provision, presents inherent challenges to achieving sustainable accessibility. While the proposed walking, cycling and bus connections seek to

address these disadvantages, they start from a position of weakness and are likely to achieve at best just a moderate level of sustainable accessibility, even when delivered. Following cancellation of the A12 scheme in July 2025, a significant element of the original strategic rationale has therefore fallen away, leaving the question of whether the remaining transport measures can adequately address the site's locational disadvantages and support development on this scale.

JRTP.16 At this stage, the published evidence identifies an interim package of improvements to the A12 principally associated with North Chelmsford Garden Community. It does not yet establish that the transport implications of Hammonds Farm have been, or can be, resolved, or that the necessary mitigation would be viable and deliverable in time to support the proposed development during the plan period. More fundamentally, the cancellation of the A12 scheme removes a significant element of the strategic transport context in which the allocation was originally promoted. The Council therefore needs to demonstrate that the strategic justification for locating approximately 3,000 homes at Hammonds Farm remains sound in these materially changed circumstances.

JRTP.17 At the same time, uncertainty remains over the capacity of the A12 and its junctions to accommodate the additional demand, the reliability of the modelling used to assess mainline congestion and merge capacity, and the extent to which traffic pressures could be transferred onto the surrounding local road network. The published evidence does not demonstrate that the necessary highway mitigation has been fully identified, shown to be sufficient, funded and deliverable within the relevant timescales.

JRTP.18 The transport evidence presently available does not demonstrate that SGS16a can be accommodated on the highway and sustainable transport networks that will actually be available. In particular, the necessary access and mitigation at Junction 18, on the A414 and the A12 mainline, including the cumulative effects of SGS16b, have not been sufficiently identified, tested or demonstrated to be deliverable. The acknowledged limitations in the strategic modelling add further uncertainty. SGS16a should not, from a transport perspective, be treated as a demonstrated deliverable strategic allocation.

John Russell – JR Transport Consulting Ltd

C. RESPONSES TO THE INSPECTORS' MATTER 4 QUESTIONS

Q4.1 Are there any consequences for the delivery of housing arising from the cancelling of the A12 widening scheme?

3. Yes. For the reasons set out at JRTP §§1–6 and §§15–18, cancellation materially changes the strategic transport context in which SGS16a was selected. The anticipated strategic highway improvements have fallen away while the development's transport demand and accessibility constraints remain. TP012 records that detailed transport assessments and site-specific modelling will continue at masterplan/planning-application stage, particularly for SGS16a. That may be appropriate for detailed design, but the Examination needs sufficient evidence now to establish that a strategic allocation relied upon for the housing requirement is realistically transport-deliverable.

Q4.3 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 development/active travel requirements?

Not for SGS16a on the evidence presently available. The Beaulieu Access Package is principally associated with established North Chelmsford growth. More importantly, the current T006 modelling assigns approximately 70% of SGS16a traffic via the A414/Junction 18 and 30% via Junction 19, and JRTP anticipates greater reliance on Junction 18 following loss of the anticipated Junction 19 capacity (JRTP §§8–10). A solution focused on Junction 19 therefore cannot by itself demonstrate transport deliverability of Hammonds Farm. The outstanding Junction 18, A414 and A12 mainline issues identified above remain material.

Q4.5 Do the costs and funding sources in the infrastructure evidence align with those identified by infrastructure providers?

4. The evidence identifies delivery mechanisms, but that is not the same as demonstrating a fully costed and secured programme. SOCG049 describes costs as high-level and indicative, and its infrastructure schedule includes critical or essential SGS16a items for which costs and/or sequencing remain TBC, including local road-network improvements and the multimodal bridge towards Junction 19. Delivery also involves third parties including Essex County Council and National Highways. Not every cost must be fixed now; the concern is the cumulative extent of unresolved cost, design and third-party dependencies for infrastructure on which the allocation relies.

Q4.9 Is there sufficient flexibility in the proposed delivery mechanisms, including the roles of CIL and section 106?

5. There is flexibility in principle: the evidence refers to developer funding, section 106/278 obligations, CIL and external funding. However, flexibility of mechanism does not

remove the need to demonstrate a credible funding route. SOCG049 contemplates possible CIL ring-fencing and external funding if required. Those are potential responses to future funding pressure, not secured funding. The issue is therefore not absence of possible mechanisms, but whether the combined infrastructure package for SGS16a can be delivered without unresolved funding dependencies undermining the assumed trajectory.

Q4.10 Are the cumulative effects of placemaking, transport and financial contributions sought through section 106/CIL for Site 16a justified and sound?

6. This cannot be answered from the evidence. SGS16a must fund or contribute to an unusually broad package of transport, sustainable-access, education, health, green-infrastructure and other works while also meeting policy requirements. Several critical or essential items remain subject to indicative/TBC costs or later definition. Viability evidence may conclude that the allocation is viable at a high level, but Q4.10 requires consideration of the cumulative burden. The unresolved transport package identified above, together with other infrastructure dependencies, needs to be reflected transparently in that cumulative assessment rather than deferred wholly to later negotiations.

Q4.12 Do T006 and T007 provide a clear picture of the transport effects of the Plan and the mitigation required?

7. Not sufficiently for SGS16a. T006 is valuable because its current modelling identifies an approximately 70/30 J18/J19 assignment, existing and forecast network constraints, displacement onto rural routes and potential merge/diverge issues. JRTP also identifies that this routing output may itself change following cancellation of the A12 scheme, with greater reliance on Junction 18 potentially resulting (JRTP §§8–10). But SOCG033 records a material limitation in the representation of A12 mainline congestion and identifies further assessment needs. TP012 nevertheless states that Local Plan modelling indicates minimal impacts at A12 Junctions 17–19 and no further Plan modelling is required, while accepting that site-specific modelling will continue for SGS16a. That tension matters where the allocation is relied upon as a major component of the housing strategy.

8. T007 does not resolve the principal concern. Its updated local-junction assessment used a 2041 forecast year and updated several junction models, but the two A12 junctions were not remodelled. Nor does it resolve the National Highways qualification regarding A12

mainline congestion and merge/diverge behaviour. The evidence therefore identifies further work as necessary at precisely the locations central to SGS16a, while the Plan assumes the allocation is deliverable.

Q4.15 Have localised, cross-boundary and cumulative transport impacts been adequately assessed and mitigated?

9. No. T006 identifies Hammonds Farm and the land adjacent to Junction 18 as significant generators on the modelled routes and assigns the majority of SGS16a traffic to Junction 18. The committed SGS16b development is now moving into detailed build-out, including a substantial 24-hour last-mile facility at Unit 300. That emerging use provides real-world evidence of the type of commercially viable development coming forward at SGS16b. The traffic generation used in the Local Plan assessment should therefore be tested against that emerging position, particularly given the materially different traffic characteristics of last-mile parcel distribution (JRTP §§11–12).

10. The Council's own evidence also identifies displacement from A12-corridor development onto surrounding rural routes, including through Boreham, Little Baddow and Sandon. Against that background, a plan-stage conclusion that cumulative effects are adequately mitigated requires a clear account of the combined SGS16a/SGS16b demand at Junction 18 and on the A414, the implications for the A12 mainline and the mitigation required. That account is incomplete.

D. CONCLUSION AND POSITION SOUGHT

11. On the evidence presently available, SGS16a should not from a transport perspective be treated as a demonstrated deliverable strategic allocation. That conclusion follows from the changed position after cancellation of the A12 scheme; the central but unresolved role of Junction 18 and the A414; the cumulative relationship with SGS16b; and acknowledged limitations and further work required in the transport modelling.

12. Those are plan-making issues, not merely matters of later detailed design. SGS16a supplies a substantial proportion of the Plan's proposed housing growth and its deliverability is therefore material to the effectiveness of the spatial strategy. Absent sufficient evidence that the necessary transport infrastructure and mitigation can be identified, funded and delivered within the assumed timescales, the Parish Councils submit that reliance on SGS16a is not justified or effective for the purposes of paragraph

35 of the NPPF (2023), and the allocation should not be relied upon to meet the housing requirement.

BEN FULLBROOK

LANDMARK CHAMBERS

21 October 2026

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