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PLANNING AND REGENERATION

# Hearing Statement
# Matter 6 – Site Selection



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 – Site Allocations: Strategic Growth Site 16a - East Chelmsford Garden Community (Hammonds Farm)

**Question a – How were sites 16a and 16b selected? What alternatives were considered? (Also addresses Qu. 6.1)**

1.1.1 Chemsford City Council's (the Council)'s published Issues and Options consultation (IO001, August 2022) proposed five spatial approaches for consultation, one being Approach E including 4,000 homes at Hammonds Farm, assessed through the Council's Integrated Impact Assessment (IIA; IIA002). This translated into the selection of Site 16a as a draft allocation at Preferred Options stage (May 2024), supported by evidence including IIA (IIA005), transport appraisals (T001/T002), landscape capacity assessment (PL004-A) and site-specific heritage assessment (PL007).

1.1.2 The alternative spatial approaches were further tested via the IIA at Preferred Options stage (IIA005) using 14 topic indicators. At Pre-Submission (Regulation 19) stage, the Council also tested alternative broad locations of an equivalent scale to Hammonds Farm, to test whether Hammonds Farm as a new large scale garden community was robust in locational as well as scale terms. None of the alternatives could secure the same level of benefits as Hammonds Farm, which is well articulated in SD008 Paragraphs 6.4.46 to 6.4.53.

1.1.3 Our peer review of the alternative broad locations tested - Chatham Green included in Option 2b, West/North-West Chelmsford included in Option 2c, and Howe Green/Rettenden Common included in Option 2d - confirms our agreement with the Council's findings that those broad locations do not demonstrate the same combination of public transport accessibility, proximity to rail services and employment opportunities, amenity provision including a new secondary school, and mixed use community creation through co-located homes and jobs, as Hammonds Farm. This confirms our agreement that the Council's IIA and site selection process has been robust.

1.1.4 In Paragraph 7.1.5 to 7.1.10 of our epresentations (Rep PS25-308) we offered a comparative exercise of the Council's Flood Risk Sequential and Exception Test, which concluded that the Council's findings were robust.

1.1.5 It has been noted by objectors that the early-stage Essex County Council Sustainable Accessibility Mapping and Appraisal of Hammonds Farm (T003) resulted in a poor score for Approach E, a hybrid of which became the Preferred Option. However, it was noted by the Council in IO001 Issues & Options

Consultation Document, Paragraph 6.51 that this assessment did not factor in mitigation capable of making the site sustainable. The appraisal method was adjusted at Preferred Options stage to take into account mitigation including public transport and active mode infrastructure provision, and on this basis Hammonds Farm was duly appraised in documents T001 and T002, resulting in a positive assessment.

**Question b – What is the planning status of both sites, including progress with masterplans and required infrastructure? (Also addresses Qu 6.3)**

1.1.6 The Masterplan Statement of Common Ground (SOCG050) between Wates and the Council provides a detailed account of the collaborative progress made on site masterplanning, including consultation on and preparation of a Strategic Masterplan and associated Infrastructure Delivery Plan (IDP) for Site 16a. The evolving Strategic Masterplan and supporting documentation is an evolution of the Vision and Concept Masterplan, IDP, Technical Summary Report and supporting evidence base reports submitted by Wates in its Regulation 19 representations (Rep PS25-242).

1.1.7 An emerging, indicative Site Capacity Plan (**Figure 1**) and indicative Framework Masterplan (**Figure 2**) represent a snapshot of where the masterplanning work has reached. While these documents have not yet been formally agreed by the Council, they reflect the extensive technical and masterplanning work undertaken to date. Bubbled areas on **Figure 2** indicate where there is ongoing discussion with the Council as recorded in the SoCG. The progress reached is considered appropriate for the current stage of the site's development.

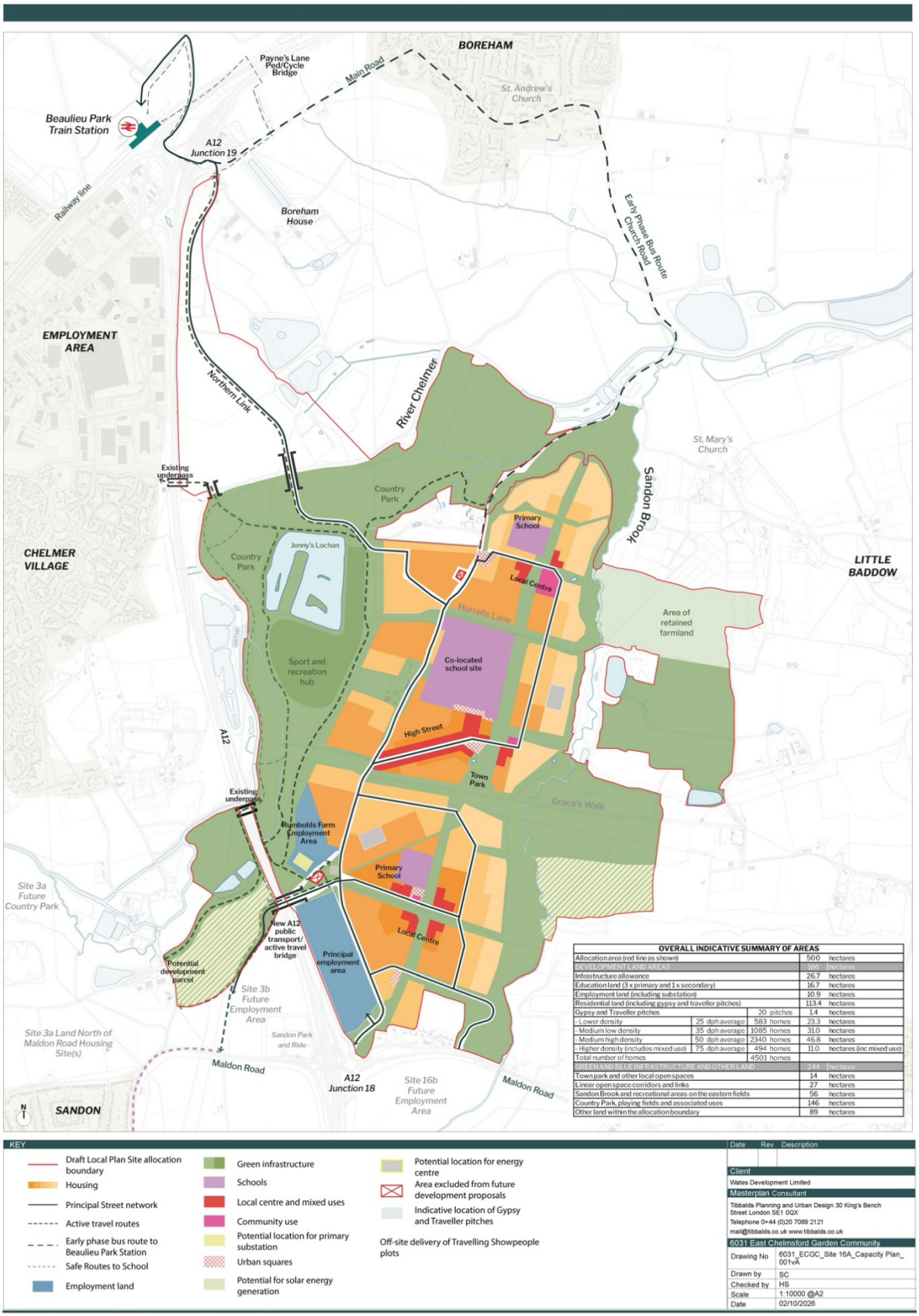



Figure 1 (Indicative Site Capacity Plan)

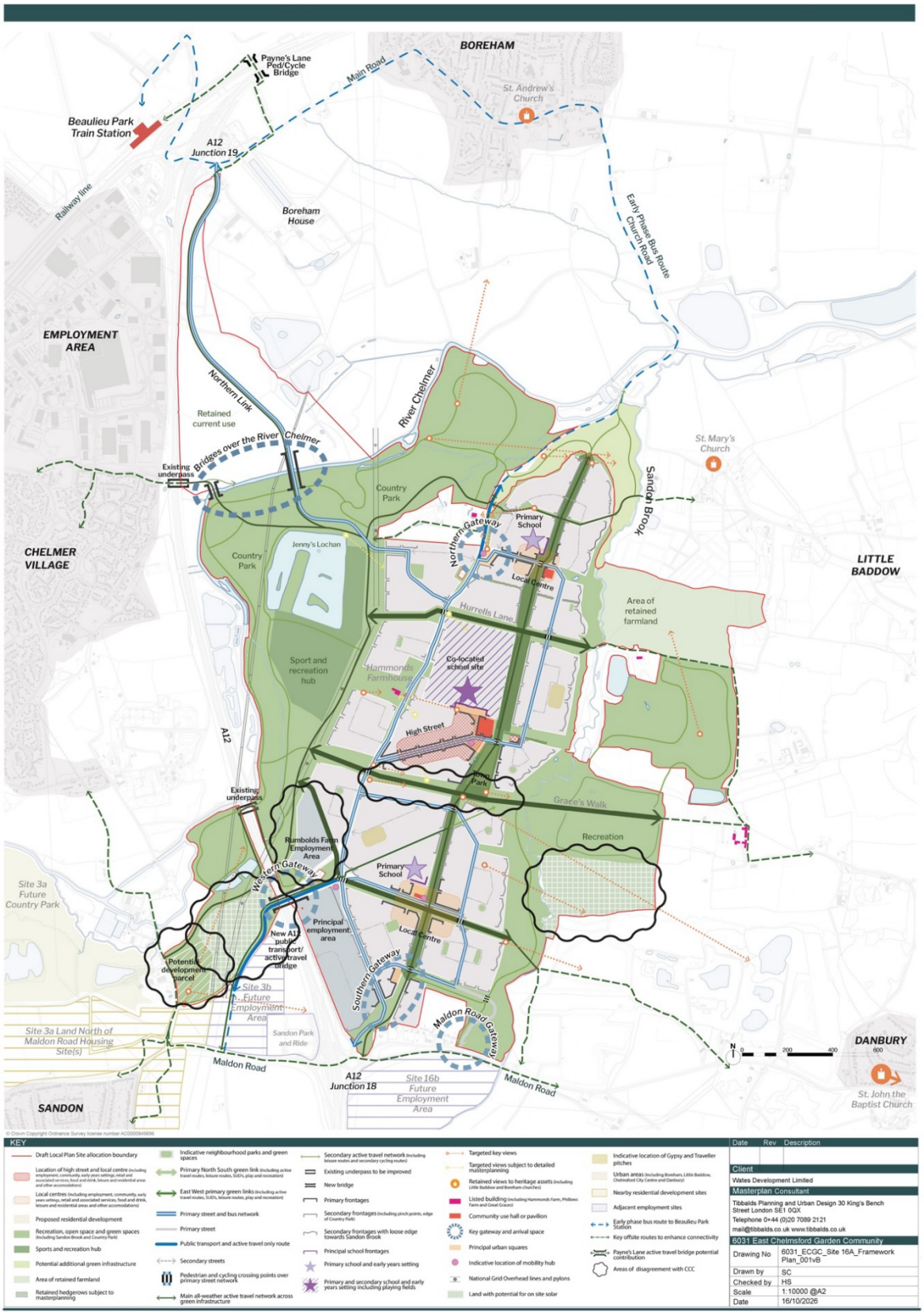



Figure 2 (Indicative Framework Masterplan)

**Question c - What is the basis for the site capacities and supporting development requirements set out in policies 16a and 16b? (Also addresses Qu 6.4 and 6.5)**

1.1.8 The site capacities for Site 16a have been based on information submitted by Wates at the SHELAA and Issues and Options stages, and testing by the Council. The emerging indicative Site Capacity Plan and indicative Framework Masterplan (shown in Figure 1 and Figure 2) are based on an appraisal of site constraints and opportunities, with versions submitted at Regulation 18 and 19 stages to assist with plan-making. These documents demonstrate the site's capacity to meet the development and supporting infrastructure requirements set out in the proposed allocation. Areas of ongoing discussion with the Council do not affect the fundamental capacity or deliverability of the site.

1.1.9 Supporting uses have been led by the Council's evidence base including those relating to employment, socio-economic and educational needs; an aspiration of the Council to target one job per home; and the TCPA Garden Community objective of providing comprehensive, mixed-use development that co-locates jobs, homes and amenities with active and sustainable infrastructure and extensive green infrastructure. These are all deliverable at Site 16a.

**Question d - What is the basis for the requirements for two Gypsy and Traveller sites and a Travelling Showpeople site on site 16a? Is this supported by evidence?**

1.1.10 The Council first proposed two Gypsy and Traveller sites within Site 16a at Regulation 18 stage, followed by an additional Travelling Showpeople site at Regulation 19 stage. These allocations are underpinned by the Council's needs assessment (AH003) and its objective of locating these uses within strategic allocations.

1.1.11 Wates' emerging Indicative Capacity Plan and Framework Masterplan (Figures 1 and 2), as well as the emerging Indicative Sequencing Plan (Figure 6), provide for the two Gypsy and Traveller sites in line with the Council's trajectory.

1.1.12 Wates' representation in response to draft Policy S7 and Policy 16a (Rep PS25-247) sought removal of the allocation for 13 Travelling Showpeople pitches. Following discussins with the Council, as detailed in SOCG046 Site Allocations SoCG and SOCG050 Masterplan SoCG, Wates is willing to accept responsibility for delivering this element of the policy requirement, subject to flexibility for provision 'on' or 'off' site. The 13 Travelling Showpeople pitches require 2.6ha of land and could be accommodated within a development parcel as shown in Figure 3. However, the heavy goods vehicles used by this community present practical challenges and potential conflicts with sustainable modal shift objectives and the creation of a safe, walkable, child-friendly environment. Allocating 2.6ha of land to this use also increases the average net housing density on the site.

1.1.13 A modification to Bullet 4 and supporting paragraph 7.358 is therefore sought to allow 'on' or 'off' site provision. Technical work exploring off-site locations is ongoing. This flexible approach would ensure

that the identified need is met as a requirement of the allocation, while allowing the masterplanning and application process to determine the most suitable location.

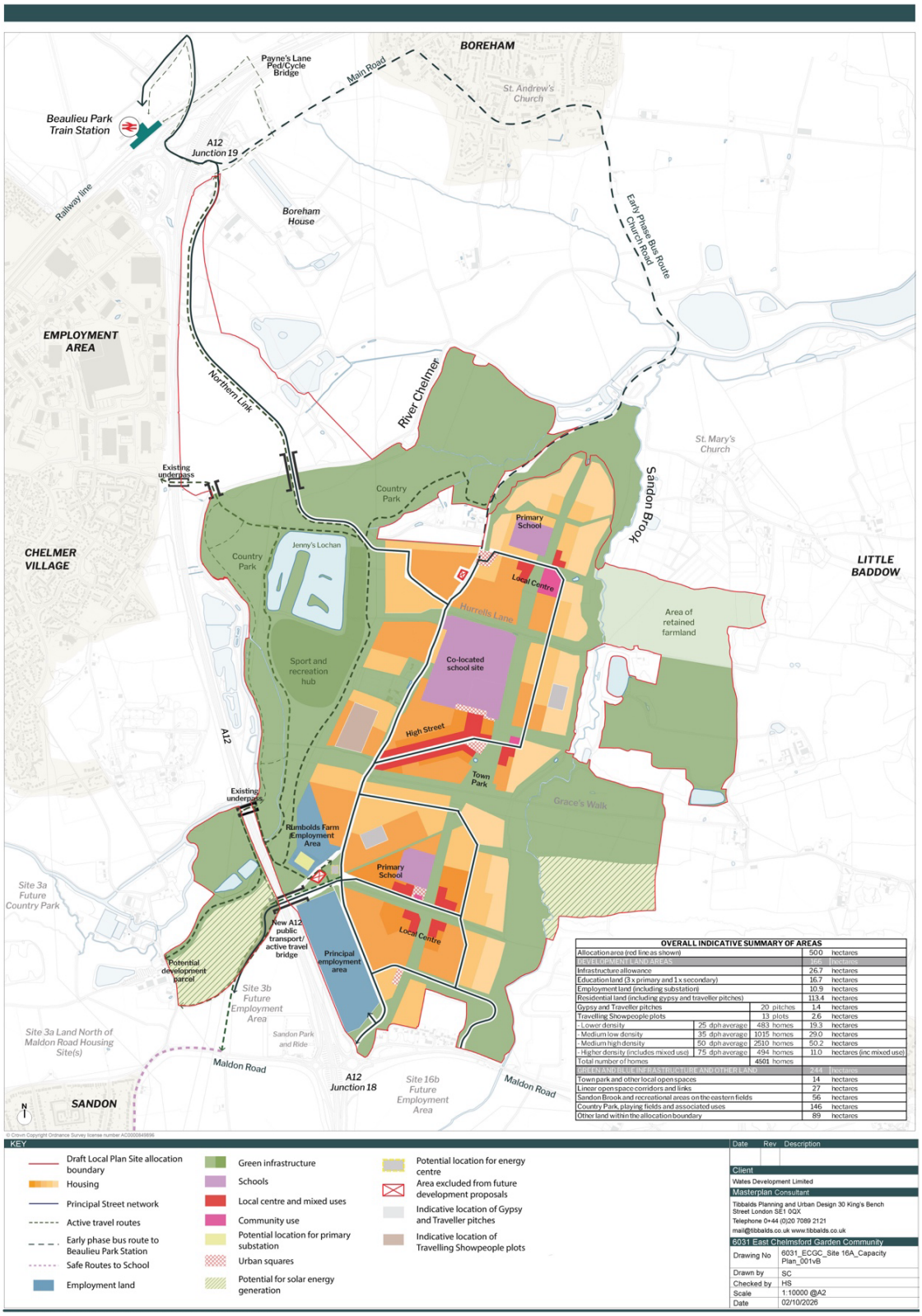



Figure 3 (Indicative Capacity Plan variation with onsite Travelling Showpeople provision)

**Question e - What would be the impact of development of sites 16a and 16b on the strategic and local highway network, including public transport and active travel? How was this assessed? What mitigation measures would be needed to support development, and how would they be funded and delivered?**

1.1.14 Essex County Council's (ECC's) strategic modelling (T006A and T007) and SLR's more detailed microsimulation modelling of the A12 corridor (Traffic Modelling Overview, Rep PS25-242) demonstrate that future congestion at Junctions 18 and 19 primarily results from background traffic growth and committed development (including Adopted Local Plan allocations) rather than Sites 16a and 16b. Proposed mitigation focuses on sustainable infrastructure targeting 60% sustainable mode share, combined with highway improvements where appropriate. Modelling confirms that targeted improvements at Junction 18 would substantially reduce queueing and improve network resilience, whilst improvements at Junction 19 (if appropriate) would reduce journey times and delay.

1.1.15 Mitigation at J18 is illustrated in Figure 4 below (Site 16b approved measures shown magenta, Site 16a measures in black).

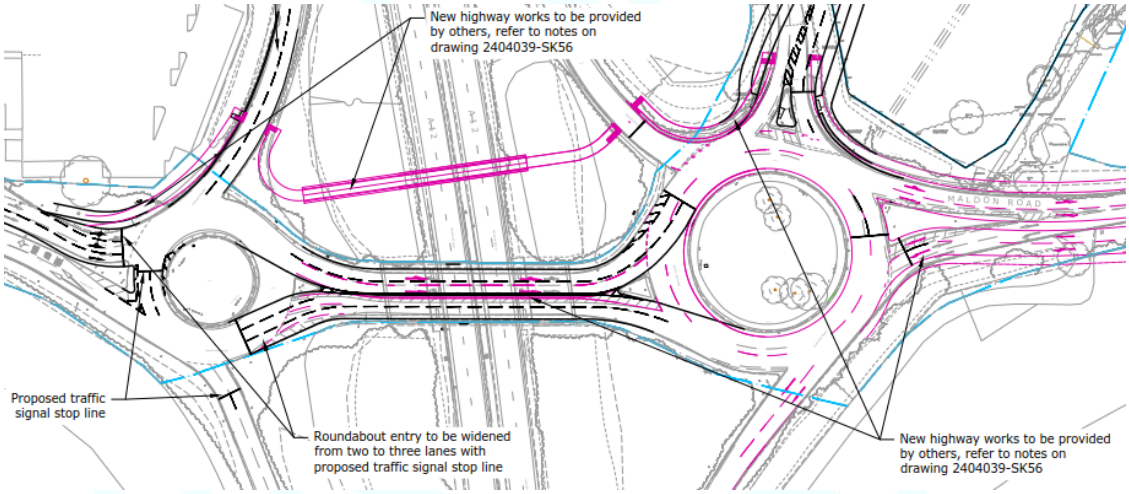



Figure 4 – J18 mitigation

1.1.16 Mitigation at J19 is illustrated in **Figure 5** below.

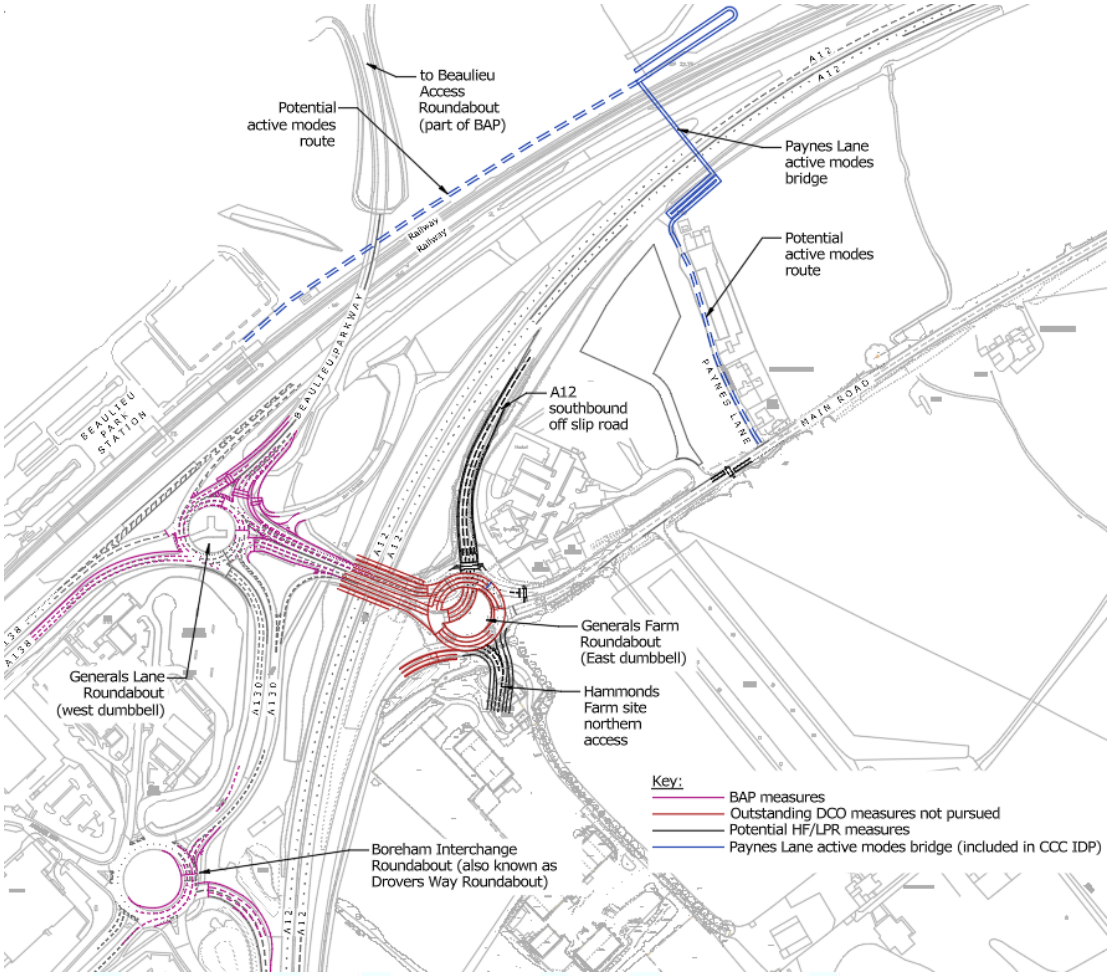



Figure 5 – J19 mitigation

1.1.17 The anticipated mitigation was assessed through detailed modelling (Rep PS25-242). Ongoing engagement with National Highways has further refined assessment (an updated Technical Note is available on request) and continues to demonstrate that development traffic can be accommodated whilst maintaining the effective operation of the strategic road network. This is confirmed within NH/ECC SoCG (SOCG033).

1.1.18 The submitted Transport Strategy (Rep PS25-242) indicates Site 16a would deliver a comprehensive package of sustainable transport measures including direct links into Chelmsford City Centre via a new bus/walking/cycle bridge across the A12, a northern link to the new Beaulieu Park Rail Station, a new bus service, and additional connecting walking and cycling routes to local destinations such as Chelmer Village. These measures are included within the site-specific IDP (Rep PS25-242) and would be funded and delivered by Wates through a combination of direct investment and, where appropriate, public funding programmes (as for the recent Beaulieu Access Package settlement). The evidence therefore demonstrates that the impacts of Sites 16a and 16b are able to be effectively mitigated and that the necessary infrastructure is deliverable.

**Question f - To facilitate development of sites 16a and 16b, will further mitigation be required at Junction 19 of the A12, over and above that already being progressed in association with the North East Chelmsford Garden Community?**

1.1.19 As indicated in response to Question 6(e) and Questions 4.1 and 4.3, whilst modelling demonstrates that the additional impact of Local Plan Review growth at J19 would be minimal (due to the low volume of traffic assignment at this junction), further highway improvements at Junction 19 would reduce journey times and delay. The current evidence does not indicate that such measures are a prerequisite, but this would be confirmed through the planning application process.

1.1.20 The primary highway enhancement would be the potential widening of the southbound A12 off slip (see Figure 5). Measures to promote sustainable transport at Junction 19, in the form of enhanced active mode crossings/routes to Beaulieu Park Rail Station, facilitate delivery of the targeted 60% sustainable mode share. Equally, proposed enhancements to Junction 18 (Figure 4) are predicted to result in a wider benefit that would improve the operation of Junction 19. These enhancements are included within the IDP and are deliverable.

**Question g - For site 16a, what is the basis for the requirement to enable a 60% share in active and sustainable travel? Is that realistic? What would be the implications of not achieving the 60% share?**

1.1.21 Garden Community guidance, including the TCPA's The Art of Building a Garden City: Standards for the 21st Century (July 2014), specifies a 50% sustainable mode share, aspiring to 60% over time. This is a typical expectation for Garden Communities, reflecting the opportunity to embed sustainable travel habits from the outset through comprehensive on-site facilities and infrastructure. This target is widely adopted in Essex and elsewhere, including North Chelmsford Garden Community (Site 6).

1.1.22 National Travel Survey (NTS) data for the East of England (2024) indicates that private vehicle drivers account for c.43.9% of journeys, with a further 20.2% undertaken as passengers. With the onsite co-location of amenities, facilities and active/sustainable infrastructure as defined in the submitted Transport and Connectivity Strategy (Rep PS25-242), Site 16a presents a significant opportunity to reduce private vehicle travel below 40%.

1.1.23 **Education** accounts for 19.4% of daily travel (NTS data 2025). Site 16a will provide three primary schools, one secondary school and six early years nurseries. All primary schools are located within a 10-minute walk of every home, and the secondary school within 15 minutes, enabling a significant proportion of trips by active modes.

1.1.24 **Employment** accounts for c.18.4% of daily travel. Onsite employment floorspace and at adjacent locations Site 16b and Site 3d, within a 10-minute walk/five-minute cycle, plus easy access to Site 6a and the city centre via bus, will enable high levels of modal shift. Direct bus/cycle links to Beaulieu Park Station will support longer-distance commuting by public transport.

1.1.25 **Shopping, services and leisure** account for c.50% of daily travel. Every home is located within a 12-minute walk or five-minute cycle of a local centre, and within a 20-minute walk or eight-minute cycle to the main services centre onsite. Healthcare, a Family Hub, sports and leisure facilities, and the Country Park will further reduce the need for off-site travel.

1.1.26 **Active travel and public transport:** A green grid of direct, prioritised and segregated walking and cycling routes connects all neighbourhoods and facilities, with every home located within 300m. Mobility hubs will provide cycle parking, travel information and convenient bus interchange. Over 80% of homes are within 400m of a bus route, with none further than 550m.

1.1.27 Wider connectivity will be enhanced through a new bus and cycle bridge over the A12, improved underpasses, active travel and direct, high frequency bus links to Beaulieu Park Station and the city centre, segregated cycle routes to southern and western destinations, and cycling network improvements including to National Cycle Route 1, which already connects the site to the city centre.

1.1.28 Initial mode share assessments indicate that the 60% sustainable mode share target is realistic. This vision-led, 'decide and provide' approach aligns with the NPPF. ECC strategic modelling (T006) indicates that achieving 60% sustainable mode share, alongside physical measures, would assist in mitigating impacts. Subsequent modelling considers a range of scenarios, including robust growth assumptions. A comprehensive Travel Plan, monitoring and proportionate additional mitigation, secured through conditions where necessary, would manage any shortfall against the target.

**Question h - What would be the impact of development on sites 16a and 16b on the following:**

- **Agricultural land, rural landscape character and heritage assets**
- **Biodiversity and green infrastructure**
- **Flood risk and prevention**
- **Air quality, light and noise pollution**
- **Other infrastructure including education, health, utilities and recreation**

**How were the above impacts assessed, and what evidence is the Council relying on?**

1.1.29 Wates' supporting evidence for these topics is summarised in the Technical Summary Report and other documents appended to Rep PS25-242.

1.1.30 **Agricultural land:** Wates' Agricultural Land Classification Survey and Comparative Appraisal identifies the loss of 183 hectares of best and most versatile (BMV) agricultural land. However, there is limited opportunity to avoid BMV loss when considering potential development locations around Chelmsford.

1.1.31 **Landscape character:** The Council's Landscape Sensitivity and Capacity Assessment (2017; PL004-A) identifies parts of Site 16a as highly sensitive due to their open character and relationship with the

Chelmer valley. However, it assesses large land parcels and does not fully recognise the potential to conserve and enhance sensitive features through green infrastructure mitigation. Wates' Landscape and Visual Baseline Appraisal (Rep PS25-242) provides a more granular assessment, identifying opportunities to mitigate impacts. The site is visually contained by topography, vegetation and the A12/River Chelmer corridor. The Green Infrastructure Strategy (Rep PS25-242) demonstrates opportunities to enhance landscape character through a multifunctional green and blue infrastructure strategy, including flood meadows, woodland and tree planting and provision of a large Country Park. With over 50% of the site proposed to be given over to green and blue infrastructure, the site has greater capacity to accommodate development than the 2017 assessment suggests, as recognised by the Council's allocation decision.

1.1.32 **Heritage assets:** The Council's Heritage Assessment for Hammonds Farm (PL007) and Wates' Archaeological and Heritage Appraisal (Rep PS25-242) demonstrate how appropriate conservation and enhancement measures would protect heritage assets on and around the site, including the Chelmer and Blackwater Navigation Conservation Area, listed buildings and other relevant assets, proportionate to their significance.

1.1.33 **Biodiversity and flood risk:** Wates' Preliminary Ecological Appraisal and Green Infrastructure Strategy (Rep PS25-242) provide initial ecological survey evidence and identify appropriate mitigation opportunities. Wates' Flood Risk Assessment (Rep PS25-242) and bespoke flood model demonstrate how flood risk can be mitigated, with built development confined to Flood Zone 1, the necessary route across the floodplain elevated above the 1-in-100-year annual probability flood event, appropriate flood compensation and a site-wide sustainable drainage strategy.

1.1.34 **Air quality, noise and lighting:** Wates' Technical Summary Report (Rep PS25-242) assesses air quality, and concludes that good masterplanning can achieve a suitable environment. Noise assessments have informed the masterplan through contour mapping, with acoustic design capable of ensuring suitable conditions. Lighting studies identify appropriate environmental zones to provide safe, functional and welcoming spaces, while minimising effects on residential, environmental and ecological receptors.

1.1.35 **Infrastructure and services:** Essex County Council's evidence base (INF004) and Wates' Technical Summary Report identify provision for education, healthcare, community facilities, utilities, sports and recreation. The development will provide land and financial contributions for education and health facilities, alongside community development strategies and stewardship arrangements. Utilities provision has been investigated and is deliverable. The Concept Masterplan and Green Infrastructure Strategy (Rep PS25-242) detail on-site sports and recreation provision. The only anticipated reliance on off-site facilities is for secondary education during the early phases, expected to be at Sandon, until the on-site secondary school is delivered.

**Question I - Are the essential site specific requirements and mitigation measures justified, and will they, along with other policies in the plan, be effective in achieving sustainable development on the sites? Can they be viably provided?**

1.1.36 With the exception of those discussed under question (l) below, yes the site-specific requirements are considered sound and justified and will be effective in achieving sustainable development.

1.1.37 Yes, the measures can viably be provided as set out in the Matter 4, Question 4.10 Hearing Statement.

**Question j - What would be the effect of development of sites 16a and 16b on national policy requirements to ensure a long term supply of minerals?**

1.1.38 Site 16a is located in a minerals safeguarding area. Wates has assessed the potential mineral reserves onsite, as submitted in the Regulation 19 Minerals Assessment Report (Rep PS25-267). Whilst reserves of sand and gravel are present, their extraction is unfeasible due to the height of the water table, as residual water ponds created by extraction would sterilise land for subsequent development. It is agreed with ECC Minerals Authority that prior extraction within suitable areas proposed for green infrastructure will take place, maximising onsite extraction potential.

**Question k - Is delivery of site 16a, including the required infrastructure and mitigation, achievable within the timescales envisaged in the Plan? How will the timely provision of infrastructure be ensured? This also addresses question 6.7 of General Site Allocation Matters.**

1.1.39 Yes, Wates' representations (PS25-317) detail the approach to securing consents and putting the necessary infrastructure in place to commence and sustain housing delivery in accordance with the Local Plan trajectory. The delivery rate for infrastructure and housing is considered realistic and achievable. With the site in single ownership and good progress already made on a Strategic Masterplan and supporting IDP, there is high confidence that the site is on track to begin delivery in 2031, aiming to deliver around 3,000 homes by 2041. This is discussed at Paragraphs 9.3.1 to 9.3.11 of the representations. Whilst some slippage in the Local Plan timetable has delayed adoption, progress in tandem on the Strategic Masterplan together with Wates' significant market experience and established housing delivery partners mitigates this delay. There is an advanced level of work already undertaken on transport and infrastructure planning.

1.1.40 An up-to-date indicative Sequence Plan is provided at **Figure 6**. Wates' site-specific IDP will specify required infrastructure items and how these will be delivered, and this will be updated in collaboration with the Council for approval through the masterplan and application stages. Timely provision will ultimately be secured and controlled through the planning permission and the S106 Agreement.

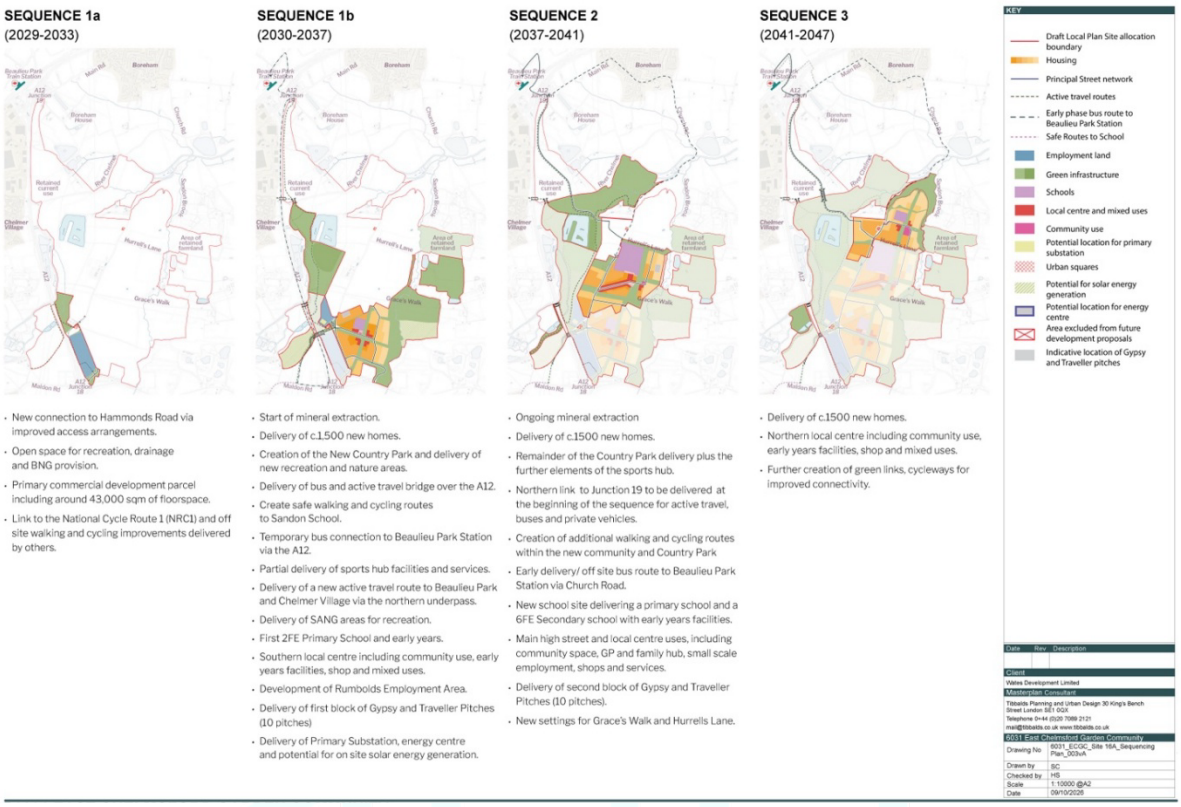



Figure 6 (Indicative Sequence Plan)

**Question I - Are any modifications to the policies for sites 16a and 16b needed to ensure an acceptable form of development is achieved?**

1.1.41 Yes. As listed in SOCG050 Masterplan SoCG What is Not Agreed section, some modifications are suggested.

Grace's Walk

1.1.42 Paragraphs 3.4.11 to 3.4.16 of our representations (Rep PS25-254) sought a modification to secure "appropriate" linear landscape buffers, as their scale and treatment should be determined through masterplanning rather than prescribed by policy.

1.1.43 We disagree with the final sentence of the Council's Mod Ref 207, which is unjustified and should be removed.

1.1.44 There is no reliable evidence to justify "substantial" or "extensive" buffers or prescribe their measurements. Scale and treatment should be subject to detailed consideration through masterplanning, reserving the opportunity to adequately address matters of: landscape, tree planting and heritage; urban design and spatial containment; safe movement and passive surveillance, particularly for women and girls (a pillar of the project vision)), and multifunctionality for play, drainage, biodiversity and recreation.

1.1.45 The Council's PL007 Heritage Assessment (Paragraph 3.46) does not quantify Grace's Walk's historic significance or evidence the prescribed offsets. Wates' Archaeological and Heritage Assessment concludes that it is a non-designated heritage asset of no more than 'low' significance, deriving from its historic interest and the contribution made by its setting (Rep PS25-242, AHA, p.43-45]. The emerging indicative Framework Masterplan (Figure 2) successfully preserves Grace's Walk's significance by retaining its existing alignment, relationship with Hammonds Road and surrounding heritage assets, using a smaller offset.

1.1.46 Mod 207's prescribed offset is overly prescriptive, conflicting with NPPF Paragraph 209, which allows decision-makers to balance harm and benefits at application stage. It should be removed.

Other Modifications

1.1.47 The remaining outstanding areas of disagreement are detailed in SOCG050:

- **Renewable energy:** Paragraphs 3.4.18 to 3.4.19 of our representations (Rep PS25-256 and PS25-301). Amend Historic and Natural Environment Bullet 10 and the Policies Map to enable suitable areas for solar development. Suitability is evidenced by the adjacent solar farm, approved in January 2021 (ref. 21/00081/FUL).
- **Additional parcels:** Paragraphs 4.1.5 and 9.3.1 of our representations (Rep PS25-301). Amend the Policies Map to reclassify land at Sandford Mill Lane and Rumbolds Farm, currently identified as Country Park, as development parcels.
- **Food retail store:** Paragraph 3.5.7 of our representations (Rep PS25-260) and SOCG050 update. Remove the 500sqm cap for food retail at Site 16a, as this locally set threshold is unsupported by evidence and a larger store would better support trip internalisation and sustainable movement.
- **Emergency services:** Paragraph 3.5.6 of our representations (Rep PS25-260) and SOCG049A. Remove the requirement for Site 16a to provide strategic (ie non-primary) healthcare or emergency services, for which there is no justification.

1.1.48 These modifications are necessary to achieve soundness by making the policy effective.

NB. Larger copies of figures are available on request.