HS013

Land West of Willow Grove, South Woodham Ferrers
Hearing Statement prepared on behalf of Dandara Eastern
October 2026

BIDWELLS

CHELMSFORD LOCAL PLAN EXAMINATION: HEARING STATEMENT PREPARED ON BEHALF OF DANDARA EASTERN (REPRESENTATION NUMBER: 1326599)

MATTER 1 ISSUE 1

Quality Assurance

Site name:	Land West of Willow Grove, South Woodham Ferrers
Client name:	Dandara Eastern
Type of report:	Hearing Statement
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Signed	
Date	20 October 2026
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Signed	
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1.0 Introduction

1.1 This Hearing Statement has been prepared by Bidwells on behalf of Dandara Eastern in support of Land West of Willow Grove, South Woodham Ferrers (SHLAA reference: 20SHELAA3/21SHELAA3 - thereafter "the site").

1.2 Dandara has promoted the site through each of the previous Local Plan consultation stages. The Vision Document submitted with their Regulation 19 Additional Sites representations showed how a development of up to 200 dwellings could come forward on this easily deliverable site, within five years, in a highly sustainable location adjacent to Strategic Growth Site 10 and just a 15 minute walk from South Woodham Ferrers train station. An extract is provided below.



Above: Land west of Willow Grove, South Woodham, Ferrers, promoted and controlled by Dandara. This easily deliverable site could boost the Local Plan's housing land supply in a highly sustainable location, close to South Woodham Ferrers mainline railway station.

1.3 The purpose of Dandara Eastern's involvement in the Examination is to demonstrate the availability and deliverability of the site, and to comment on Matter 1. These comments are based on the Regulation 19 representations under Comment ID: **PSQ25-6011** and **AS-1138**.

1.4 This Hearing Statement responds to:

- Matter 1: Legal and Procedural Requirements

- Issue 1: Whether the Plan has been informed by a Sustainability Appraisal
  - Questions 1.1 to 1.3

2.0 Response to Matter 1, Issue 1

Question 1.1: Is it clear how the preparation of the Plan and its policies have been informed by the Sustainability Appraisal (Integrated Impact Assessment January 2025 (SD008) and Integrated Impact Assessment: Additional Sites (Regulation 19) Addendum November 2025 (SD009)) at each stage and how mitigation measures have been dealt with?

2.1 The evolution of the Plan demonstrates that the preferred spatial strategy has required adjustment. In particular, the need for the Additional Sites Consultation arose following concerns regarding the Council's ability to demonstrate a five-year housing land supply. This suggests that some of the delivery risks associated with large strategic allocations have become more apparent over time.

2.2 Whilst mitigation measures have been identified through the IIA process, including infrastructure improvements and site-specific policy requirements, significant reliance continues to be placed upon a limited number of large strategic allocations and associated infrastructure interventions, particularly in relation to strategic highway improvements.

2.3 Dandara considers that the additional sites consultation highlights the importance of maintaining a broader portfolio of development opportunities.

Question 1.2: Do the Sustainability Appraisals robustly test the Plan against reasonable alternatives for the allocated sites for housing, employment and retail and other types of development?

2.4 The Sustainability Appraisals demonstrate that a range of strategic growth options were considered throughout the plan-making process. However, it is not considered that sufficient weight was given to certain reasonable alternatives, particularly those that could provide further growth through sustainable urban extensions adjoining existing settlements.

2.5 The earlier stages of plan preparation considered a range of spatial approaches, including growth focused on urban areas, expansion of existing allocations and a more dispersed pattern of development. The Council's evidence acknowledged that over-reliance on very large strategic developments would not provide a good mix of development sites. Notwithstanding these findings, the submitted strategy is still reliant upon a limited number of major strategic allocations, including Hammonds Farm. Although the results of the Additional Sites Consultation were welcome, in Dandara's view, the Sustainability Appraisal process does not appear to have fully tested whether further growth through additional sustainable urban extensions could provide a more flexible and deliverable strategy. This includes opportunities at Land West of Willow Grove, South Woodham Ferrers, which was promoted throughout the plan-making process. It received a positive rating in the SHELAA and it could contribute to housing delivery in one of the most sustainable locations in the City Council's administrative area, given that it is in the top tier of the settlement hierarchy.

2.1 Specifically, the Integrated Impact Assessment (IID) supporting the first Regulation 19 consultation did not assess the potential benefits of further allocations north of South Woodham Ferrers, nor of smaller sites adjacent to other existing higher order settlements. It stated simply at 6.4.41 that:

> *"It was not considered appropriate to try to meet the remaining residual needs through a selection of additional small sites.*
>
> *Over 90 small sites were submitted for consideration for development. More than half have been discounted because they are in the Green Belt or Green Wedge. Many other sites are unsuitable for a number of reasons, such as due to not meeting other Local Plan policies on a wide range of issues, being in an unsustainable location, being distant from defined settlements, or other factors including topology.*
>
> *A number of smaller site allocations are allocated but attempting to meet residual needs would not be feasible due to the lack of site supply. Even if this could be accommodated, it would not be a balanced strategy. While the smaller sites could potentially deliver faster than the large scale sites, they would not deliver the same benefits in terms of new or improvements to existing community services and facilities. Some of the smaller sites being allocated form part of a larger promoted area, where a larger allocation may not be appropriate for the settlement due to issues such as access, surrounding density and character, along with not helping the Council to meet the 10% small sites target."*

2.2 The update to IID supporting the Additional Sites consultation did not do so either. It only assesses the option of allocating a single strategic site or sites as a reasonable alternative. It does not assess the potential benefits of allocating further smaller sites to boost housing supply.

2.3 Dandara's land west of Willow Grove does not therefore appear to have been properly considered, despite it having been assessed positively in every category considered by the SHELAA (SHELAA reference: 20SHELAA3 and 21SHELAA4).

2.4 The Council and the Inspector must consider the benefits of development on the site further, as part of a wider assessment of reasonable alternatives, before the Plan can be found sound.

Question 1.3: What alternative options were considered, which were discounted and were the reasons for this clear?

2.5 The plan-making process considered a range of alternative spatial strategies, including growth to existing urban areas, expansion of existing allocations, a more dispersed pattern of development across sustainable settlements and the creation of a new strategic settlement. Dandara is concerned that the conclusions reached during the plan-making process do not reflect the findings of earlier assessment work. For example, the Issues and Options Consultation 2022 acknowledged that an over reliance on large strategic allocations would not provide a good mix of development sites overall.

2.6 Notwithstanding this, the submitted strategy has evolved towards a significant reliance on the proposed new settlement at Hammonds Farm. Whilst Dandara recognises the potential long-term role of Hammonds Farm in meeting development needs, the strategy assumes that a substantial proportion of housing growth will be delivered from a single strategic location requiring significant infrastructure investment and intervention.

2.7 Dandara's previous representations highlighted that the Council's evidence did not consistently identify Hammonds Farm as the most sustainable strategic option. The Council's own Sustainable Accessibility Mapping and Appraisal concluded that growth focused on existing urban areas and urban extensions performed more favourably, with the Hammonds Farm option ranking towards the bottom of the assessed locations. Notwithstanding this, the submitted strategy became increasingly reliant on Hammonds Farm to deliver a significant proportion of the District's housing requirement. This reliance is particularly notable given the extensive infrastructure requirements associated with the scheme, including improvements to Junctions 18 and 19 of the A12, the A414, the A1060, Essex Yeomanry Way and the provision of new bridge connections and community infrastructure. Furthermore, the Government's subsequent decision to cancel the A12 widening scheme has heightened concerns regarding the deliverability of the strategy.

2.8 The subsequent need to undertake the Additional Sites Consultation reinforces these concerns. The Council acknowledged that delays to strategic sites, revised delivery assumptions and a worsening housing land supply position required additional allocations to improve flexibility and resilience. Without those additional allocations, the Council estimated that it would be unable to demonstrate a five-year housing land supply on submission.

2.9 This raises questions as to whether greater weight should have been afforded to alternative approaches, such as sustainable urban extensions including Land West of Willow Grove, South Woodham Ferrers. Such an approach would provide a more balanced portfolio of deliverable sites.

2.10 Whilst Dandara accepts that alternative options were considered throughout the preparation of the Plan, it is not clear that the reasons for selecting a strategy so heavily reliant on Hammonds Farm remain fully justified in light of the delivery challenges that have subsequently emerged and the Council's acknowledged need to identify additional sites to support housing delivery and plan resilience.

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