CARNEYSWEENEY

PLANNING AND REGENERATION

HS015

Hearing Statement
Matter 1- Legal and Procedural Requirements



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 Plan has been informed by a Sustainability Appraisal

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?

1.1.1 Yes. As set out in Section 15 of our representations (Main representations document appended to Rep PS25-242; also Rep PSIIA-13), we believe the Council has undertaken a fair and clear process in assessing the plan-making options at each stage of the process, which has informed the preparation of the Plan.

1.1.2 Appendix G of the Pre-Submission Integrated Impact Assessment (SD008 p.482) appraises each of the site allocations against the Assessment Framework. The approach to mitigation is described in Paragraphs 5.6.3 and 5.7.1 and measures are listed in the Appendix tables (eg. p.513 for Site 16a).

1.1.3 Our representations (Rep PS25-308) also support the process of assessing flood risk in parallel with the Sustainability Appraisal, via the SFRA Level 1 and 2 (CC001 and CC010), and the Sequential and Exception Tests (CC011, CC012, CC013, CC019 and CC021).

1.1.4 Staged transport modelling work was undertaken in parallel to inform the IIA assessments, particularly the Transport Impact Appraisal of Spatial Approaches (T001) and Transport Impact Appraisal of Preferred Spatial Approach (T002). 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 went on to become the Preferred Option. However, it was clearly noted by the Council in IO001 Issues & Options Consultation Document, Paragraph 6.51 that this assessment did not factor in any 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 of the site.

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?

1.1.5 Yes, we consider that robust testing is demonstrated by the Sustainability Appraisals. It is not the role of the Sustainability Appraisal to test every conceivable alternative as these would be innumerable. A robust set of alternatives, both in terms of the scale of growth and its spatial distribution, has been assessed through the Appraisal Framework. Chapter 6 of the IIA (SD008 pp. 170-203) deals comprehensively with the assessment of alternatives, applying the same level of testing to the

alternatives as to the proposed strategy as set out in Paragraph 5.6.3 of the IIA (SD008). Table 6.5, paragraphs 6.4.47 to 6.4.53 and the (unnumbered) Assessment of Reasonable Alternatives tables (SD008 pp.186-201) provide in clear terms the scoring and reasons for the dismissal of the reasonable alternatives.

1.1.6 We respond to the key challenges to the Sustainability Appraisal with reference to the Council's Summary document SD012 below.

Crest, Dandara and TWSL (Representor 1380359)

1.1.7 Rep PSIIA-31 (SD012, p.22) challenges the Council's formation of Option 2c in pairing the North/North-West Chelmsford group of sites for housing and employment with an employment site at Howe Green (J17 of the A12) as a false choice. Instead, the representor suggests North/North-West Chelmsford could have been paired with the Site 16b employment site at Junction 18 of the A12. It is not necessary to test every permutation. Had this particular option been tested, we consider that it would still not achieve the same sustainability benefit as the selected option. Housing and employment growth in the representor's version of Option 2c would remain divided between western and eastern sides of the city, forgoing the opportunity of concentrated, comprehensive development in one location, as the co-location of Sites 16a and 16b achieves. Site 16a enjoys proximity to two rail stations (city centre and Beaulieu Park), compared to the representor's proximity to only one. Site 16a being in sole ownership is preferable to the collaboration of three parties at West/North-West Chelmsford, by avoiding the coordination complexity at masterplanning and consent stage inherent with sites in multiple ownership. The swapping of Howe Green with Site 16b may have resulted in slightly improved accessibility outcomes for Option 2c, but this would not materially affect the overall conclusions of the assessment, and Option 2c would still fall short of Option 2a, especially in addressing Strategic Priorities 2 and 4 of the Local Plan. There would be no difference to the conclusions of the SA, nor is any revision to the SA required as the nature of these differentiations would have been evident to the decision-maker. As stated above, the potential permutations of options is innumerable, and an appropriate set of robust and distinct alternatives has been tested.

1.1.8 At Paragraph 3.35, Rep PSIIA-31 (SD012, p.21) criticises the reasons for rejecting Option 3 (higher level growth). Its proposed remedy is adopting a higher housing requirement and allocating North/North-West Chelmsford, but it does not address the consequent increase in employment need that would arise with increased housing, nor identify a site or location that would be suitable, appropriate, deliverable and capable of scoring as well as the preferred option, with its co-location of housing and employment uses. The IIA Objective 3 assessment (SD008 p.191) notes "the importance of balancing population and employment growth was emphasised within the most recent Employment Land Review 2023 … Significantly increasing the quantum of housing could disrupt the relationship between housing and employment growth, leading to out-commuting."

1.1.9 At Paragraph 2.21, Rep PSIIA-31 (SD012 p.24) criticises the IIA for assessing the Standard Method of September 2024 instead of December 2024 due to time shortages (IIA Paragraph 6.4.9). The difference between the September figure (1,406dpa) and December figure (1,454dpa) is minimal, compared to the uplift from April 2024 of 913dpa.

Dandara (Representor 1326599)

1.1.10 Rep PSIIA-39 (SD012 p.25, Paragraph 2.31) refutes the Council's sustainable accessibility findings for West/North-West Chelmsford as having poorer connectivity into the urban area of Chelmsford than the selected strategy. We agree with the Council's findings, given that North/North-West Chelmsford has access to only one railway station (Chelmsford) compared to two stations close to Site 16a (Chelmsford and Beaulieu Park). As the Council's assessment suggests, it appears there are difficulties with the implementation of bus priority measures in this area (for example a direct link required of adopted Site 2 West Chelmsford has not materialised due to feasibility reasons), whilst the selected option benefits from its own provision of bus priority measures (a new bus/cycle/pedestrian bridge and western link) in tandem with those already committed at the Army and Navy roundabout. Hammonds Farm is directly connected to the city by National Cycle Route 1 while no such link exists in the north-western area of the city. The representor refers to the early stage Sustainability Mapping as evidence Hammonds Farm scores the most poorly but we disagree with that conclusion as described in Paragraph 1.1.4 of this hearing statement.

1.1.11 We disagree with the assertion that the location of Sites 16a and 16b (SD012, p.26) is "poorly connected to Chelmsford's urban area by anything other than car-based transport". Site 16a's proposed Transport and Connectivity Strategy (appended to Rep PS25-242) describes Hammonds Farm's strong connectivity links via direct bus services, a new bus/cycling/walking bridge across the A12 linking into existing key routes, a new direct bus and cycling link to Beaulieu Park Rail station, multiple active travel routes connecting to destinations offsite including Chelmer Village retail and Springfield employment area, National Cycle Route 1 to the city centre, and proximity to Sandon Park and Ride. These attributes and measures have been assessed by the Council in undertaking the IIA.

1.1.12 At p.89 (Rep ASIIA-49), Dandara expresses concern at the spatial strategy's reliance on Junction 19 of the A12 believing the cancellation of the DCO to pose a significant deliverability risk to the Plan. As discussed in detail in our Matter 4 hearing statement, detailed technical work has been undertaken to demonstrate that J19 is capable of operating with the proposed Local Plan growth, having regard the delivery of the Beaulieu Access Package works and if required, further works to support the delivery of Site 16a. The Councils agree that this is an appropriate position at this stage.

1.1.13 Gladman Developments Ltd (Representor 1301644)

1.1.14 Rep PSIIA-53 (SD012, p.33-35) argues that the IIA has not tested alternative levels of housing requirement *in isolation*, instead opting to test one single housing requirement of 1,240 (referring to IIA Table 5.2, Page 128). We consider that this fails to recognise that the testing of the spatial options

in IIA Table 6.3 serves the same purpose by varying the scale of housing requirement between Options 1, 2 and 3, and indeed that by testing housing and employment requirements together the IIA been able to take full account of cumulative considerations and of the spatial relationship between housing and employment uses (ie benefits arising from co-location and opportunity for convenient journeys). The Council clearly describes the reasons for testing the quantum of growth (SD008 Paragraphs 6.4.2 onwards) and establishing the spatial strategy options (Paragraph 6.4.25 onwards including Table 6.3 and Table 6.4) which form the reasonable alternatives. We consider the analysis to be sufficient and fit for purpose.

1.1.15 The representation suggests that if further work had been undertaken, it would likely be evident that the Hammonds Farm allocation would not be the most reasonable approach. It does not elaborate on the nature of this work. We disagree, given that very detailed evidence and promoter submissions (both by Hammonds Farm and omission sites) have assisted the Council in its assessments.

1.1.16 The representation puts forward an alternative strategy comprising dispersed growth of sites at Boreham, Howe Green, East Hanningfield, Rettendon, Bicknacre and Danbury. These are small settlements that benefit from little urban connectivity and lack the ability to deliver any of the consequent benefits of comprehensive delivery of amenities and infrastructure in one location with the ability to shorten trips between homes, facilities and places of work. At Issues and Options stage Approaches A, C and D tested various iterations of a dispersed strategy, and the IIA (IIA002) discounted them in favour of the benefits of a new garden community. The representation asserts that those sites could provide the infrastructure required to remedy their isolated location, but the scale of the challenge to make these sites sustainable seems to us to be far greater than for Hammonds Farm, given the adjacency of Hammonds Farm to the city boundary, railway station, park and ride, dedicated cycle routes, along with the well-investigated provision of new infrastructure. Two of the Gladman sites have been allocated through the Additional Sites process (c.115 homes at Site 17c and c.150 homes at SGS17d), which is considered an appropriate scale of growth for those villages.

Ms Kate Jennings (1380310)

1.1.17 Rep PSIIA-22 (SD008 p.40) disputes that the Council has not looked at alternative options within the Green Belt. We do not consider there is any error by the Council as there is no reason for the Council to consider options within the Green Belt when there is suitable land outside the Green Belt. The December 2023 NPPF is clear that there is no requirement for Green Belt boundaries to be reviewed or changed (Paragraph 145); indeed, boundaries can only be altered in exceptional circumstances and this test would not be met where non-Green Belt sites are available.

1.1.18 Rep PSIIA-22 contends that the allocation of Hammonds Farm creates a settlement that is not cohesive with the existing city settlement or surrounding settlements. We disagree. As shown by the settlement diagram on p.5 of the submitted East Chelmsford Garden Community Vision and Concept Masterplan (Rep PS25-242), the Hammonds Farm site is a natural eastern extension to Chelmsford city, similar in

scale but closer to the city centre than the North East Chelmsford Garden Community. Hammonds Farm leverages investment in new rail infrastructure at Beaulieu Park, and connects into the city via existing key bus and cycle routes (National Cycle Route 1) as well as along the Chelmer green corridor. There are shown to be no coalescence issues with surrounding settlements and the site is contained by the local topography and the Chelmer valley.

1.1.19 Rep PSIIA-22 indicates that the site was discounted in favour of alternative sites at the last Local Plan stage. This does not mean it is not suitable for development; simply that North-East Chelmsford was preferred. Since 2020 the opening of Beaulieu Park station, the extension of the Hammonds Farm landholding northwards to allow direct connectivity to Junction 19 and Beaulieu Park, and the need for plan-making to allocate five years' additional housing growth are the revised conditions for the SA assessment of this Local Plan. When tested as a reasonable alternative to the Preferred Option in 2020, the Hammonds Farm site was judged to be close in merit to the allocated North-East Chelmsford in terms of planning deliverability and acceptability. It is now the logical successor, as discussed at Paragraph 9.2.3 of our Representations (Rep PS25-313).

Selection of Option 2a over the reasonable alternatives

1.1.20 We support the IIA's conclusions in selecting the preferred strategy. In relation to Hammonds Farm, the reasonable alternatives tested all miss the opportunity to secure the combination of available benefits offered by Hammonds Farm, which are:

- Strong spatial location in proximity to city and Beaulieu Park Rail station
- Development scale sufficient to achieve a secondary school, primary schools, healthcare community infrastructure, services, amenities and a country park onsite
- Mix of uses onsite to reduce trips and shorten journey times
- Coordinated infrastructure delivery, including meaningful and deliverable sustainable and active travel connections
- Sole site ownership, enabling faster progress through the masterplanning and planning stages than assembled multiple ownership sites, to achieve delivery within expected timescales
- Garden Community approach to development including stewardship arrangements.

1.1.21 We therefore support the SA process as having robustly tested reasonable alternatives.

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

1.1.22 As discussed in Question 1.2 the consideration of alternative options and the reasons for discounting them is well set out in Section 6.4 of the Pre-Submission IIA (SD008, pp.174-203). Consideration of alternatives at the previous stages of plan-making is set out in Section 6.3 of the same document (SD008, pp.173-174).

1.1.23 This process is also well summarised in Paragraphs 4.78 to 4.99 of the Council's Topic Paper on Spatial Strategy and Strategic Sites (TP010).

1.1.24 In our view, the reasons for the consideration and discounting of reasonable alternatives is entirely clear.

1.1.25 The Council's Issues and Options consultation (IO001, August 2022) proposed five spatial approaches for consultation, supported by an IIA providing assessment of those five approaches. With the identification of a Preferred Option in May 2024, the alternative spatial approaches were further tested via the IIA (IIA005) using the 14 topic indicators to support the Council's selection. At Pre-Submission (Regulation 19) stage, the Council also tested alternative broad locations of an equivalent scale to Hammonds Farm, to evidence that the selection of Hammonds Farm as a new large-scale garden community (Site 16a) 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. This assessment also considered different scales of growth.

1.1.26 Our peer review of the alternative broad locations tested as part of that alternatives exercise - 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 cannot 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.