HS027

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 3

ISSUES 1, 2, 3 AND 4

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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Date	20 October 2026
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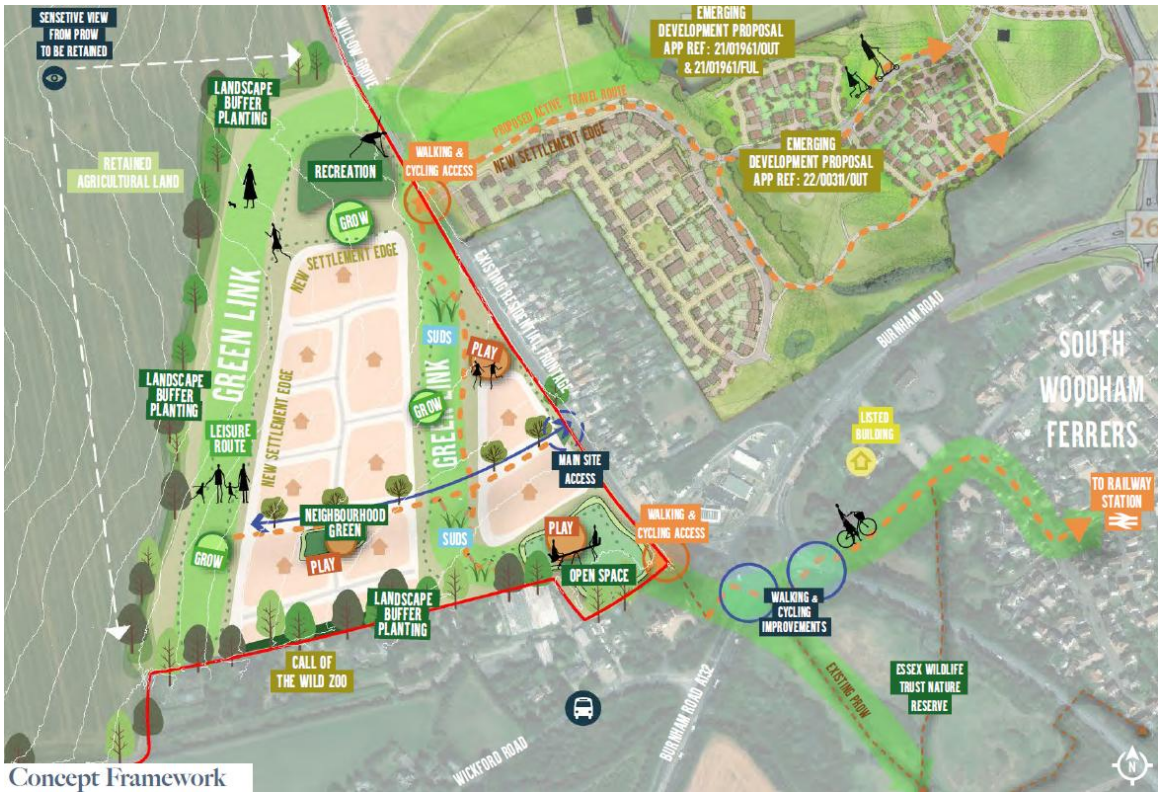
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1.0 Introduction

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, which could boost the draft Local Plan's housing land supply in a highly sustainable location

1.3 The purpose of Dandara Eastern's involvement in the Examination process is to demonstrate the availability and deliverability of the site, and to comment on the proposed spatial strategy. These comments are based on the Regulation 19 representations under Comment ID's: **AS-1137, AS-1138, AS-1140, AS-1141, PSQ25-6209, PSQ25-6210, PSQ25-6211, PSQ25-6212** and **PSQ25-6213** (Policies S1, S6 and S7).

1.4 This Hearing Statement responds to:

- Matter 3: Strategic Priorities, Development Requirements and Spatial Principles

- Issue 1: Whether the Plan will be effective in addressing the Strategic Priorities for the climate, growth and place
  - Question 3.2
- Issue 2: Spatial Principles [Strategic Policy S1]
  - Questions 3.3 and 3.6
- Issue 3: Whether the Plan makes adequate provision for housing [Strategic Policy S6]
  - Questions 3.10, 3,11, 3,12 and 3.13
- Issue 4: The Spatial Strategy [Strategic Policy S7]
  - Questions 3.18 and 3.19

2.0 Response to Matter 3, Issue 1

Question 3.2: The Plan period is 2022 to 2041. What is the Council's anticipated date of adoption? Would the strategic policies of the Plan look ahead over a minimum of 15 years from adoption as required paragraph 22 of the National Planning Policy Framework (the Framework)? Is the approach justified, effective and consistent with national policy?

2.1 The Focused Additional Sites consultation anticipates adoption in late 2026 or early 2027, resulting in a plan period of only around 14 to 15 years from adoption. It now appears extremely unlikely that the Plan will be adopted in 2026, meaning it is almost certain that the Plan will fall below the required 15-year period identified in national policy. The Council suggests this is acceptable because it is a transitional plan.

2.2 This position is a choice, not a necessity, due to the availability of additional sites in sustainable locations that could allocated now to deliver a further year of development to meet requirements. Doing so would also deliver a plan that is more resilient in the short to medium term.

2.3 The Examination should consider whether further allocations are required now to ensure delivery throughout the Plan period and maintain an appropriate housing land supply position. Sites such as the Land West of Willow Grove, South Woodham Ferrers present an opportunity to boost housing supply in one of the City Council's most sustainable locations and enhance the resilience of the Plan.

3.0 Response to Matter 3, Issue 2

Question 3.3: Does the policy provide the right approach to the distribution of development?

3.1 No, the proposed distribution of development does not make the most effective use of the most sustainable settlements in the City Council's area.

3.2 In particular, South Woodham Ferrers is identified alongside Chelmsford at the top of the settlement hierarchy and is recognised by the Council as one of its most sustainable settlements due to its services, facilities, employment opportunities and rail connectivity. Despite this, the distribution of development proposed by the Plan is not adequately justified and does not properly reflect the availability of sustainable and deliverable growth opportunities in top tier settlements.

3.3 Dandara maintains an objection to the justification for a new settlement to the East of Chelmsford (Hammonds Farm), taking account of the reasonable alternatives, including the allocation of further urban extensions on the edge of the urban area. We refer the Council and the Inspector to objections made to the previous Regulation 19 Additional Sites consultation, which remain valid.

3.4 Dandara's concerns are exacerbated by the reliance of the Spatial Strategy on Junction 19 of the A12. This is a significant deliverability risk, due to the Government's decision to cancel planned improvements to the A12 that would have delivered required capacity. The Local Plan's traffic modelling concludes that the full improvements that were proposed to Junction 19 are required as a minimum to deliver the strategic growth expected by the Local Plan.

3.5 Furthermore, the evidence base supporting the draft Plan has not been sufficiently updated to justify the decision to allocate Hammonds Farm in favour of other options that are better connected to existing services. Whilst the Integrated Impact Assessment (IIA) assessed a range of strategic spatial growth options, it did not undertake a comparative assessment of whether additional growth at South Woodham Ferrers, including Land West of Willow Grove, could provide a complementary alternative to the reliance placed upon Hammonds Farm. Although individual SHELAA sites were assessed, the strategic alternatives tested by the IIA focussed primarily on broad strategic growth scenarios rather than examining the comparative merits of distributing a greater proportion of development to sustainable higher-order settlements such as South Woodham Ferrers.

3.6 The omission of Land West of Willow Grove is inconsistent with the objective of directing development towards sustainable locations. The site adjoins the existing urban area and Strategic Growth Site 10 and is within walking distance of South Woodham Ferrers railway. It can deliver up to 200 dwellings immediately adjoining the existing urban area. However, the evidence base does not clearly explain why such opportunities have been discounted in favour of increased reliance on Hammonds Farm.

3.7 The spatial strategy is therefore insufficiently justified as it does not clearly demonstrate why additional growth at South Woodham Ferrers and Chelmsford should be excluded from the development strategy in favour of the substantial reliance placed upon Hammonds Farm.

Question 3.6: Does it provide flexibility to achieve sustainable development through a range of site types and sizes?

3.8 No. The Council's decision to undertake the Additional Sites consultation was prompted by the inability to demonstrate a five-year housing land supply. Without the additional allocations, the Council estimated that only 4.93 years of housing land supply would be available on submission.

3.9 The Additional Sites consultation added more small to medium scale sites to boost five-year supply. While the additional allocations improve the position, the Plan remains reliant upon a small number of large strategic sites and previously allocated sites that have yet to deliver housing. This demonstrates the importance of maintaining a broad portfolio of sites of different scales and locations.

3.10 Medium sized sites such as Land West of Willow Grove are capable of delivering housing more quickly than strategic allocations such as Hammonds Farm and provide greater flexibility if larger sites underperform. The Plan would therefore benefit from additional allocations capable of delivering housing in the short to medium term.

4.0 Response to Matter 3, Issue 3

Question 3.10: Is the housing requirement of 1,210 dpa justified, evidence-based and consistent with national policy?

4.1 The Council proposes a housing requirement of 1,210 dwellings per annum, representing a buffer of approximately 8% above the minimum requirement. This is significantly lower than the 20% buffer approach adopted in the current Local Plan and previously proposed through the earlier stages of the Local Plan review. The Council's own evidence demonstrates that housing delivery has historically fallen below expectations despite the existence of a larger buffer.

4.2 Given the acknowledged delays to strategic sites, Dandara remain concerned regarding the substantial contribution expected from Hammonds Farm, which is expected to deliver 3,000 new dwellings by 2041, some 13% of the total housing requirement. We do not believe that it is safe to rely on 3,000 new homes being delivered at Hammonds Farm during the Plan period. It is widely accepted that new settlements require substantial upfront infrastructure investment before they can deliver new housing, and Hammonds Farm is no exception. We presented extensive evidence on this subject in our Regulation 19 representations.

4.3 The supply of specific deliverable sites should include a buffer of 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply. Additional deliverable allocations such as Land West of Willow Grove, South Woodham Ferrers are required to provide greater confidence that the housing requirement will be met.

Question 3.11: Do the potential implications of using the higher Standard Method figure justify the lower figure in Policy S6?

4.4 No, the implications of the higher Standard Method figure reinforce the need for additional housing supply rather than a reduction in planned growth. The Additional Sites consultation acknowledged that Chelmsford’s housing requirement would be considerably higher if assessed against the full Standard Method figure and confirms that the Council already faces pressure from increasing housing need and housing delivery challenges.

4.5 In these circumstances, it is important that the Plan incorporates sufficient flexibility and resilience to respond to changing circumstances. This further supports the need for further allocations capable of contributing to housing supply during the early years of the Plan.

Question 3.12: Are there any risks to the delivery of housing as a result of the supply buffer?

4.6 Yes, the proposed buffer of 8% provides limited flexibility should delivery of the large strategic allocations falter. The Council's own evidence demonstrates that the Additional Sites consultation was necessary because housing delivery projections had deteriorated to the point where a five-year housing land supply could no longer be demonstrated. Without the additional allocations, the Council estimated a supply of only 4.93 years.

4.7 This is a very different approach to that considered necessary for the adopted Local Plan, which allocated sufficient development to allow a 20% buffer over and above the minimum housing supply requirement that arose from the Framework's standard method at the time. Paragraph 6.7 of the adopted Local Plan explained the reasoning behind this:

> *"Using the full OAHN of 805 new homes per year, the total requirement is a minimum of 18,515 dwellings for the 23 years from 2013-2036. To provide flexibility in the supply of housing sites and help significantly boost its supply, the Council proposes to allocate development sites in the Local Plan to provide close to a further 20% supply buffer above the OAHN. The buffer allows for an additional housing supply in Chelmsford to be maintained throughout the Local Plan period. This same approach was implemented by the Council's previously adopted LDF covering the period 2001-2021"*

4.8 Despite allowing for this buffer, actual delivery has still fallen short of anticipated supply during the first 12 years of the adopted Local Plan's period. The Council's latest Housing Trajectory (April 2026) confirms that an average of 841 dwellings were completed during the period 2013/14 to 2025/26, approximately 11.5% below the 950 dwellings per annum that were planned for delivery during that period (taking an average of the 21,843 dwellings planned for delivery across the 2013-36 Plan period as a whole).

4.9 This performance was largely achieved during a period of strong market demand and substantial windfall from the conversion of redundant office blocks and other buildings following the expansion of permitted development rights in the early 2010's, in the context of a Plan that allowed a lower windfall allowance of 100 new homes per year.

4.10 It is also a different approach to that considered necessary at the Preferred Options draft stage, when enough sites were allocated to deliver a 20% buffer on top of the housing requirement. Paragraphs 6.6-6.9 of the Preferred Options Draft Plan explained the approach then.

4.11 There are also significant risks associated with the reliance on Hammonds Farm. Major new settlements typically require substantial upfront infrastructure investment and long lead-in times before housing delivery can occur. Dandara's Regulation 19 representations also highlighted evidence regarding typical lead-in and build-out rates for developments of this scale and the historic underperformance of strategic allocations within Chelmsford.

4.12 By implementing a 20% buffer including a range of medium-sized sites such as the Land West of Willow Grove in South Woodham Ferrers, the Council will be more likely to consistently deliver their housing supply throughout the plan period, thereby reducing risk and improving resilience of the Plan.

Question 3.13: Are there particular constraints to identifying additional sites within the Plan period in the event of housing and employment development not coming forward as envisaged?

4.13 No, the Council has already demonstrated through the Additional Sites consultation that further allocations can be identified where necessary to improve housing supply and delivery. The need to undertake this exercise arose because delays to strategic sites and revised delivery assumptions resulted in a worsening five-year housing land supply position.

4.14 There is no evidence to suggest that further suitable and deliverable sites could not be identified if required. Land West of Willow Grove presents one such opportunity. The site has been promoted throughout the Local Plan process, assessed positively through the SHELAA process and is controlled by a willing developer. The site, which is capable of delivering 200 dwellings in a highly sustainable location adjoining the existing settlement and Growth Site 10, has been subject to engagement with both Chelmsford City Council and Essex County Council through the pre-application process. The principal concerns raised through the pre-application process related to highway capacity and wastewater infrastructure rather than the site's locational sustainability, availability or suitability for development.

4.15 In respect of highways, subsequent transport modelling undertaken by PJA assessed the impact of 200 additional dwellings at the site. This work concluded that, under a 'Business as Usual' scenario, the development would not result in severe impacts on the local highway network and would therefore be consistent with the test set out in the NPPF. Furthermore, assessment of a Transport Vision scenario demonstrated that a mode shift of 5% development traffic and 3% background traffic to reduce the development's impact to nil-detriment would be achievable. The findings indicate that the transport impacts associated with the site are capable of being appropriately mitigated and should not prevent the site from contributing towards housing delivery within the plan period.

4.16 Similarly, whilst wastewater capacity has been identified as a constraint affecting growth at South Woodham Ferrers, the Council's pre-application response acknowledged that this is not a barrier to future development growth. Additional capacity will need to be provided by Anglian Water.

4.17 Overall, the evidence demonstrates that constraints affecting the site are capable of resolution and do not preclude development within the plan period. Accordingly, there are suitable alternative sites that could be identified to maintain housing delivery should allocated sites fail to come forward as anticipated. The Plan would therefore benefit from a more flexible approach which recognises the role that sustainable sites, including Land West of Willow Grove, could play in maintaining supply and supporting the soundness of the development strategy.

5.0 Response to Matter 3, Issue 4

Question 3.18: Given the Plan's reliance on meeting development needs in the SUEs and new garden communities and taking into account their scale, is there sufficient flexibility and resilience built into the Plan to deliver the housing growth envisaged, in the event of any underperformance of these allocations?

5.1 No. The need to undertake the Additional Sites consultation is evidence itself that additional flexibility was required to support delivery and maintain a five-year housing land supply.

5.2 This process did not go far enough, however, and the Plan remains heavily reliant on a limited number of strategic sites, particularly Hammonds Farm. Significant risks remain regarding infrastructure delivery, lead-in times and build-out rates, as explained in our Regulation 19 representations. These risks are amplified by the cancellation of the A12 widening scheme and ongoing discussions regarding future improvements to Junction 19.

5.3 Greater resilience could be achieved through the allocation of additional sustainable sites capable of coming forward independently and in phases. An opportunity exists on Land West of Willow Grove, South Woodham Ferrers. Allocation of this site now would diversify delivery sources and reduce reliance upon a limited number of strategic allocations. It would also introduce a third developer to South Woodham Ferrers, increasing competition in the market and encouraging quicker housing delivery in this key location.

Question 3.19: What alternative approaches were tested in the preparation of the Plan?

5.4 The plan-making process initially contemplated a broader and more dispersed growth strategy. However, the submitted strategy ultimately became increasingly reliant on a limited number of major strategic allocations, including Hammonds Farm. The subsequent need for an Additional Sites Consultation demonstrates the risks associated with the approach.

5.5 Dandara's concerns are exacerbated by the reliance of the Spatial Strategy on Junction 19 of the A12. This is a significant deliverability risk, due to the Government's decision to cancel planned improvements to the A12 that would have delivered required capacity. The Local Plan's traffic modelling concludes that the full improvements that were proposed to Junction 19 are required as a minimum to deliver the strategic growth expected by the Local Plan.

5.6 Dandara has promoted land West of Willow Grove, South Woodham Ferrers throughout the plan-making process. Land West of Willow Grove would provide a sustainable urban extension to one of the District's highest-order settlements. The site adjoins both the existing urban area and the allocated growth at Strategic Growth Site 10 and is capable of delivering approximately 200 dwellings in a highly sustainable location. South Woodham Ferrers occupies the highest tier of the settlement hierarchy alongside Chelmsford, reflecting its role as a principal settlement with a broad range of services, facilities and public transport connections.

5.7 The site was assessed through the SHELAA process under references 20SHELAA3 and 21SHELAA4 and received an overall green RAG rating, including green ratings for suitability, availability and achievability.

5.8 The Council's evidence does not appear to have fully tested the benefits of additional growth at South Woodham Ferrers. The Integrated Impact Assessment acknowledges that the allocation site North of South Woodham Ferrers, due to its close proximity to the town centre and associated facilities and services, has a significant positive effect on sustainable living (IIA Objective 4). Therefore, the allocation of Land West of Willow Grove would align with both Objective 4 (Sustainable Living) of the IIA and Policy S7 of the submission Local Plan, directing development to the District's most sustainable locations.

5.9 Accordingly, Dandara considers that a reasonable alternative strategy would have involved a broader distribution of growth through additional allocations at sustainable urban extensions, including South Woodham Ferrers. Such an approach would improve flexibility, strengthen delivery resilience and provide a more balanced portfolio of sites across the District.

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