CHELMSFORD LOCAL PLAN EXAMINATION

MATTER 3

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 the Regulation 19 stage through a representation prepared by Walsingham Planning (March 2025) ("**the Reg.19 Response**"), accompanied by technical notes from Stomor. They objected to Strategic Policies S6 and S7 and Strategic Growth Site Policies 16a and 16b. The Parish Councils' case is that the allocation of Hammonds Farm (SGS16a) ("**the site**") makes the Plan unsound. Measured against §35 of the NPPF (2023), it is not positively prepared, not justified, not effective and not consistent with national policy. This statement concentrates on SGS16a. The adjoining employment allocation next to A12 Junction 18 (SGS16b) is addressed only where it adds to the impacts of SGS16a, chiefly on the A414 and Junction 18.

B. ISSUE 4 – THE SPATIAL STRATEGY

Q3.17 Is this approach justified, soundly based and consistent with national policy?

Q3.18 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?

Q3.19 What alternative approaches were tested in the preparation of the plan?

2. The Parish Councils rely primarily on their responses to Matter 1 Questions 1.2 and 1.3 in relation to the justification for the spatial strategy and the alternatives considered (see the Parish Councils' Matter 1 Hearing Statement).

3. In addition, the Parish Councils make the following points on the questions above:

    a. The strategy relies heavily on large strategic sites and garden communities, including SGS16a. The alternatives assessment did not test a distributed approach comprising a greater number of smaller or medium-sized sites, despite the Council subsequently adopting precisely that approach when additional sites were required. For the reasons set out in the Parish Councils' Matter 1 Hearing Statement, the choice to rely on Hammonds Farm has therefore not been shown to be justified when compared with reasonable alternative spatial approaches.

    b. Nor has sufficient flexibility and resilience been demonstrated in the event that SGS16a underperforms. The Council's own IIA Addendum records that three strategic sites have stalled or been significantly delayed and recognises that strategic sites can have longer lead-in times [**SD009**, §§2.3.1, 2.3.14]. SGS16a is the largest new strategic allocation in the Plan, providing 3,000 homes within the Plan period, yet its strategic transport infrastructure and access arrangements remain unresolved following cancellation of the A12 widening scheme. If SGS16a does not deliver at the scale or pace assumed, the Plan does not identify an equivalent tested alternative capable of replacing that shortfall. The spatial strategy is therefore insufficiently flexible and resilient.

BEN FULLBROOK

LANDMARK CHAMBERS

21 October 2026

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