HS012

Land at North West Chelmsford
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 at North West Chelmsford
Client name:	Dandara Eastern
Type of report:	Hearing Statement
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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 at North West Chelmsford (hereafter "the site"). Dandara has promoted the site through each of the previous Local Plan consultation stages. Dandara controls the whole site demarked with the red line boundary plan shown in their Regulation 19 representations[1]. Part of the site was allocated as Strategic Growth Site 18a (SGS18a) for the delivery of 100 new homes in the Regulation 19 Additional Sites Focused Consultation Document.

1.2 The purpose of Dandara's involvement in the Examination is to demonstrate the deliverability of SGS18a and to highlight the availability of further development parcels that could come forward at North West Chelmsford in line with the Local Plan's Spatial Strategy to meet housing needs if required.

1.3 An addendum to the Vision Document submitted at the Regulation 19 Additional Sites stage is appended to our Hearing Statement on Matter 6 to show how further independent development parcels or phases could be allocated if required, supported by technical evidence.

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

[1] *Dandara Limited Regulation 19 Local Plan Representations (March 2025): Appendix 1, Figure 2, page 5*

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 Chelmsford.

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 further opportunities at North West Chelmsford promoted throughout the plan-making process and included in four of the five spatial options considered at the Issues and Options stage. Further land is available at North West Chelmsford that could contribute to housing delivery in a sustainable location and does not rely on substantial upfront infrastructure interventions.

2.6 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 west of Chelmsford that are better connected to existing services. The Integrated Impact Assessment supporting the previous Regulation 19 consultation suggested that housing growth at West Chelmsford was only considered in one of the six spatial strategy options tested. This was Option 2(c), where 3,000 dwellings would have been delivered at West and North-West Chelmsford (21SHELAA41; CFS165; CFS182 (Part); CFS82; CFS80; 21SHELAA100; 21SHELAA17; CFS183), including on Dandara's land. It suggests that this option was rejected because:

- *"Although adjacent to the Chelmsford Urban Area, the sites at West and North-West Chelmsford have poorer connectivity into the urban area of Chelmsford, and as such they are relatively isolated from the strategic highway network. There are less opportunities create sustainable routes to existing public transport or provide new Bus Based Rapid Transit infrastructure.*
- *The sites that comprise the West and North-West Chelmsford site option are under multiple ownerships, which may delay delivery and result in piecemeal development*
- *Employment opportunities would be less accessible to the wider population (for example through public transport)."* Para 6.4.51

2.7 Dandara continues to dispute these findings, for the following reasons:

- The sites cannot be considered to have poorer connectivity to the Chelmsford's urban area. Not only are they more proximate to it, enabling genuine opportunities to walk or cycle to Chelmsford City Centre and access other services and facilities in its urban area, they are located directly adjacent to existing public transport routes and other infrastructure. This position is supported the Council's own Sustainable Accessibility Mapping and Appraisal evidence base document 2022 (document T003), which scored eight potential development locations. The Edge of Chelmsford extension (which included West Chelmsford and East Chelmsford) scored fourth best. Only the brownfield development options in the urban area, North-East Chelmsford and South Woodham Ferrers scored better. Location 8, the Hammonds Farm option, scored second worst.
- The ownership structure of the sites at West and North-West Chelmsford will not significantly impinge upon their delivery timeframes or risk piecemeal development. Dandara alone controls 81 hectares of land at North-West Chelmsford that can deliver a sustainable new neighbourhood of around 1000 new homes. It could come forward in isolation, or as part of a wider allocation to include land to the south and south-west controlled by Taylor Wimpey and Crest Nicholson.
- All three developers are collaborating on the promotion of these sites, demonstrated by the submission of joint representations at the first Regulation 19 stage, but none of the parcels are reliant on each other for delivery. Concerns about multiple land ownerships should not be a reason to discount growth at West and North-West Chelmsford. Indeed, we would urge the Council to see the positives of this situation, given the likelihood of quicker delivery from multiple outlets offering diversity of product.
- The main employment opportunity proposed at Hammonds Farm is the separate employment site 16b, located adjacent to junction 18 of the A12. This could come forward without the wider residential-led allocation. In any case, whilst this location is accessible from the A12, it is poorly connected the population of Chelmsford's urban area by anything other than car based transport.

2.8 The Council and the Inspector must consider the benefits of development at West and North West Chelmsford more thoroughly before the Plan can be found sound. It should re-appraise the conclusions drawn in the Integrated Impact Assessment at the Regulation 19 stage and consider each of the development opportunities promoted independently by Dandara, Taylor Wimpey and Crest Nicholson, in addition to the cumulative opportunity they represent due to each party's willingness to collaborate.

2.9 It is acknowledged that the IIA accompanying the Regulation 19 Additional Sites Addendum identifies significant positive effects from SGS18a in meeting housing needs. However, it does not assess the reasonable alternative of allocating further land within the wider North West Chelmsford masterplan.

2.10 It is therefore considered that the benefits of further phased growth at North West Chelmsford have not been fully assessed. Additional allocations would increase housing supply, diversify delivery and improve the resilience of the Plan.

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

2.11 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.

2.12 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.

2.13 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.

2.14 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.

2.15 The Additional Sites process subsequently proposed allocations at North West Chelmsford, comprising around 100 dwellings at SGS18a and 200 dwellings west of Patching Hall Lane nearby as SGS19. The Additional Sites IIA identifies significant positive effects for housing at both sites, alongside mixed effects for sustainable living and transport. This demonstrates that urban-edge development at North West Chelmsford can and should be an appropriate part of the spatial strategy.

2.16 Whilst it is acknowledged that the allocation of these sites does not necessarily establish that the wider promoted land should be allocated in full, it demonstrates that the earlier rejection of growth in this location was not based on an overriding spatial or sustainability constraint.

2.17 Dandara's January 2026 representations and subsequent masterplanning work identifies capacity for the delivery of approximately 160 dwellings at SGS18a and a further 832 dwellings on the wider holding, with parcels or phases of development within this area capable of independent but coordinated delivery. Further growth should therefore have been assessed as a reasonable alternative to Hammonds Farm consistent with paragraphs 32 and 33 of the 2024 NPPF, and the requirement in paragraphs 61 and 72 to provide a sufficient mix of deliverable and developable sites.

2.18 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 remains justified in light of the delivery challenges being experienced in Chelmsford.

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