Stakeholder: Wates Developments and Hammonds Estates LLP (872955)
Comment ID: PS25-242
Consultation Point: Site 16a

Representation

Q3 Do you consider the Local Plan 'sound'?
No

If no, this is because you consider the Local Plan is NOT:
Effective;

Please provide an explanation below and identify the main issues.
As site promoters, Hammonds Estates and Wates Developments strongly support the allocation of Site Policy 16a East Chelmsford Garden Community (Hammonds Farm), which represents a deliverable development in a sustainable location afforded by its proximity to both existing and planned infrastructure. We agree that the allocation accords with all of the Local Plan Review's Spatial Principles and its supporting Sustainability Appraisal and will make a highly positive contribution to Chelmsford's housing, jobs and infrastructure delivery needs in a comprehensively planned way. It is reflective of the NPPF's support for larger-scale sites to achieve the delivery of infrastructure in tandem with development (Paragraph 74), stating that "the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes)". It is our view that large scale sites, in single ownership, can deliver benefits that cannot be realised through smaller sites coming forward in combination. We support the site's allocation for around 3,000 homes to be delivered by 2041, with a further 1,500 homes after 2041 (totalling 4,500 homes); 43,000sqm of employment space; gypsy and traveller provision; mixed use neighbourhood centres; a new all-through school (secondary, primary and potential sixth form); two further primary schools and early years and childcare nurseries as defined in the draft allocation policy; significant infrastructure including a new Country Park, and transport infrastructure to encourage sustainable and active travel. The project team has a strong and innovative vision, which is to improve the social mobility and life chances of every individual living in the East Chelmsford Garden Community. Of primary importance is the commitment to family and community success, with a particular focus on the wellbeing, inclusion and safety. By widening the ladder of opportunity and removing the physical and social barriers that exist, we aim to help more people within the community to progress more easily in life and reach their full potential. This inclusive vision forms a golden thread through how the Garden Community is being designed and planned, and means that social priorities are given significant weight when balancing considerations. The vision for East Chelmsford Garden Community offers an opportunity for a fresh approach to placemaking, one that is primarily focused on creating a strong community where people can thrive. Achieving this relies on a holistic design approach - not just focusing on the physical aspects, but on how the built environment supports service provision and nurtures wellbeing, including through long-term stewardship arrangements. We believe that we can help to create a successful community in and around Hammonds Farm through embedding ideas under the following themes: The right ingredients for family and community success Everything on your doorstep - a connected place delivering active and sustainable travel Embracing net zero for healthier lives and planet. We are committed to delivering a new part of the city that makes a difference, not only for the new residents and business who will live there, but also others in the city and surrounding villages. We are ambitious and looking forward to the opportunity to work with the Council and the wider community through the Local Plan Review process. Through careful design and construction, combined with thoughtful stewardship, East Chelmsford Garden Community can be a wonderful place to live. Our principles are fully described in the submitted Vision and Concept Masterplan document and go

above and beyond many of the principles normally delivered through the planning process in the pursuit of innovation and real change. These include a commitment to adopt principles such as stewardship, culture, community engagement and beautiful and imaginatively designed places and homes. Our priority focus around families and community sits at the heart of the ideas for this new neighbourhood. Understanding the specific needs of different ages, groups and people means that we can address a variety of needs and offer the kind of opportunities that do not come from smaller monocultural developments. Health and wellbeing, whether through active travel, sport and recreation, local food growing, or through having a cohesive and involved community, will be a core part of how the community is delivered. These priorities will be embedded into how the place is planned, including how the community are given the opportunity to get involved in shaping the evolving masterplan and design codes. These are a key part of the long term management and stewardship of an inclusive place. Hammonds Estates and Wates Developments has a full specialist team appointed who have undertaken detailed technical investigations and assessments across the site. The site is in single ownership, and is free from complex land assembly negotiations, and benefits from two direct accesses and a range of active and sustainable connectivity routes. These representations are supported by technical information which demonstrates that the site's constraints and opportunities have been investigated in support of this Local Plan allocation, and that for the purposes of this stage in the preparation of the Local Plan there are understood to be no showstoppers that should prevent the allocation of the site for housing, employment, schools and associated infrastructure. This pack of information consists of: A Vision and Concept Masterplan Document, which presents a concept masterplan for 4,500 homes, reflecting the site's capacity up to and beyond 2041. ECGC (Hammonds Farm) Technical Summary Report – 2025 Update – setting out technical strategies across a number of topics. ECGC (Hammonds Farm) Infrastructure Delivery Plan – explaining the approach to implementing the site and its associated infrastructure within the planned timescales. ECGC (Hammonds Farm) Transport and Connectivity Strategy – 2025 Update ECGC (Hammonds Farm) Traffic Modelling Overview ECGC (Hammonds Farm) Archaeological and Heritage Appraisal – 2025 Update ECGC (Hammonds Farm) Green Infrastructure Strategy ECGC (Hammonds Farm) Landscape and Visual Baseline Appraisal – 2025 Update ECGC (Hammonds Farm) Flood Risk Strategy ECGC (Hammonds Farm) Ecological Appraisal ECGC (Hammonds Farm) Mineral Assessment Report ECGC (Hammonds Farm) Agricultural Land Classification Survey and Comparative Appraisal. For this Regulation 19 consultation process, our representations to this policy section, Site 16a, provide commentary where there are concerns about deficiencies in the draft site policy wording around soundness as defined by the NPPF. In terms of the portal, these are submitted individually alongside the corresponding supporting paragraphs (to facilitate separating them out), as well as in the attached full PDF of our Written Representations. Subject to our proposed modifications being accepted, we can strongly endorse the Site 16a allocation policy as sound, in terms of being well justified, effective and consistent national policy, and therefore suitable for adoption as a significant contributor to the Local Plan Review spatial strategy. At present, the allocation is not sound but this can be remedied by the requested modifications. The draft policy text with our recommended modifications is the basis on which the submitted Vision and Concept Masterplan, IDP and suite of documents have been prepared, thus demonstrating that the allocation is capable of delivery within the plan period. The full text of our Written Representations is provided as an attached PDF, with additional supporting documents attached. Together these represent our full submission to the Local Plan Review consultation.

Please set out the changes you consider necessary to make the Local Plan 'sound' including revised wording of any policy or text.

No modifications are requested to this Introduction section. Individual policy modifications are requested via separate entries in the following sections.

Q4 If your representation is seeking a change, do you consider it necessary to take part and speak at the Examination?

Yes

Q4a If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

As site promoters, we request attendance at the examination to discuss any matters relating to Site 16a. Should there be matters relating to Policy 16a to which we have not sought specific modifications but are the subjection of others' objections, we would request attendance to address the Inspector directly to express support for the allocation and address any technical points.

Q6 Do you wish to be notified of the following:
Submission of the Local Plan for Examination; Publication of the Inspector's Report; Adoption of the Local Plan;

Attachments

Vision and Concept Masterplan - 2025 Update.pdf
Technical Summary Report - 2025 Update.pdf
Infrastructure Delivery Plan.pdf
Transport & Connectivity Strategy.pdf
Traffic Modelling Overview.pdf
Archaeological and Heritage Appraisal - 2025 Update.pdf
Green Infrastructure Strategy.pdf
Landscape and Visual Baseline Appraisal - 2025 Update.pdf
Flood Risk Strategy.pdf
Preliminary Ecological Appraisal PS.pdf
Mineral Assessment Report.pdf
Agricultural Land Classification Survey.pdf
Written Representations - Wates and Hammonds Estates.pdf (12)

Stakeholder: Wates Developments and Hammonds Estates LLP (872955)
Comment ID: PS25-245
Consultation Point: Site 16a, Para 7.357

Representation

Q3 Do you consider the Local Plan 'sound'?
No

If no, this is because you consider the Local Plan is NOT:
Justified; Consistent with national policy;

Please provide an explanation below and identify the main issues.
The amount and type of development for 3,000 homes, with a further 1,500 homes after 2041, is supported. The submitted Vision and Concept Masterplan demonstrates that the site has capacity to accommodate this quantum of development, and the submitted Infrastructure Delivery Plan provides an illustrative phasing sequence to show that 3,000 homes can be delivered by 2041. This is further discussed in reference to Policy S7: Spatial Strategy. Dedicated employment floorspace of around 43,000sqm is supported, with initial principles described in the submitted Technical Summary Report, and the site's capacity to support this quantum demonstrated in the Vision and Concept Masterplan. In relation to the nature of the housing delivery at East Chelmsford Garden Community, the supporting text at paragraph 7.357 discusses the objective for the development to create a mixed and inclusive community, which is strongly supported. The enclosed Vision and Concept Masterplan and the Technical Summary Report set out principles for the way in which the Garden Community can contribute meaningfully to the full range of Chelmsford's housing needs. The tenure, type and mix of the housing provision across all site allocations will be determined by Policies DM1 and DM2. The content mix of these policies is broadly supported, but it is felt that owing to the Garden Community's scale, there is a site-specific opportunity to deliver an even broader mix of tenures and types to serve the widest range of needs and budgets. As such we consider there should be the opportunity to consider Build to Rent, intermediate rent, co-living, older persons and keyworker housing which are not reflected in the Local Plan Review's development management policies. Each of these tenures comes with its own optimal unit mix, so this could require the ability to depart from the policy mix. As described in our representations on the Policies Map, we are putting forward two new parcels within the site boundary, currently annotated as Country Park, to be reallocated as development parcels. Should this be accepted the development quanta achievable on Site 16a could be slightly increased, and would enable a small portion of housing delivery to commence earlier than the main development parcels (eg in the plan's first five years), as described in the submitted Infrastructure Delivery Plan. It will be for the masterplan stage to determine the exact overall capacity of the site, and it is noted that the Local Plan Review helpfully states at Paragraph 6.30 that the development quanta quoted is a minimum number. Therefore, no change is sought to the amount and type of development listed, but corresponding adjustments to the Policies Map are requested. It is noted that the site was promoted by Hammonds Estates LLP at the Issues and Options stage for around 5,500 homes, employment, schools and associated infrastructure, which included a proposal for housing on land within the site boundary that is currently identified for 'Future Recreation Use and/or SuDS and/or Biodiversity'. The reduced development area within the site boundary that the Pre-Submission Local Plan identifies for the delivery of 4,500 homes was instead proposed by the Council during its plan preparation. The site promoters continue to consider that the land identified for 'Future Recreation Use and/or SuDS and/or Biodiversity' has potential for residential development (with estimated capacity of around 700 homes) and could be re-allocated in future to meet future housing need. This would be of wider benefit such as helping to support the viability of key site infrastructure such as the secondary school, which is noted by Essex County Council to be on the cusp of viability at 4,500 homes. Should the Council wish to reconsider the site for a larger quantum of residential development through the remaining stages of this Local Plan

Review, the promoters are willing to offer further assessment and evidence to support any modifications the Council wishes to bring forward. In parallel, corresponding changes to widen the map notation for this land to enable consideration of solar or other appropriate renewable energy uses is also sought in our representations on the Policies Map. The full text of our Written Representations is provided as an attached PDF. The supporting documents referred to are attached to our main response under Site Policy 16a.

Please set out the changes you consider necessary to make the Local Plan 'sound' including revised wording of any policy or text.
To maximise the effectiveness of the policy and the Local Plan Review's consistency with Paragraphs 63 and 74(b) of the NPPF, we propose that additional wording be added to invite consideration of a bespoke and broader housing mix on this site, via a modification to Paragraph 7.357, as follows: Paragraph 7.357, insert after sentence 2: Consideration of Build to Rent and other tenures including intermediate rent, co-living, older persons and keyworker housing should be made, so that the Garden Community can accommodate a broad mix of tenures and types through a holistic offer that serves the widest range of needs. Reason: to make the policy sound in terms of consistency with national policy, and appropriateness.

Q4 If your representation is seeking a change, do you consider it necessary to take part and speak at the Examination?
Yes

Q4a If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:
See statement in introduction to Site Policy 16a.

Attachments

Written Representations - Wates and Hammonds Estates.pdf (15)
Vision and Concept Masterplan - 2025 Update.pdf (2)
Infrastructure Delivery Plan.pdf (3)
Technical Summary Report - 2025 Update.pdf (1)

Stakeholder: Wates Developments and Hammonds Estates LLP (872955)
Comment ID: PS25-247
Consultation Point: Site 16a

Representation

Q3 Do you consider the Local Plan 'sound'?
No

If no, this is because you consider the Local Plan is NOT:
Justified; Effective;

Please provide an explanation below and identify the main issues.
Two Gypsy and Traveller Sites, each for 10 serviced plots, is supported. A Travelling Showpeople site for 13 serviced plots is not supported. With reference to comments made on Policy S7 Spatial Strategy, we consider that this requirement has been unjustifiably transferred from Strategic Growth Site Policy 6a North East Chelmsford since the Regulation 18 stage, and should be reinstated there. The addition of this requirement to Site 16a does not reflect the respective scales of the two Garden Community allocations; it does not distribute needs appropriately across the district; and it will be challenging to accommodate at Site 16a in tandem with the proposed Gypsy and Traveller provision. The full text of our Written Representations is provided as an attached PDF. The supporting documents referred to are attached to our main response under Site Policy 16a.

Please set out the changes you consider necessary to make the Local Plan 'sound' including revised wording of any policy or text.
In order to reflect a more balanced and proportionate distribution of land uses across the district, the following modifications are sought: Amount and Type of Development, deletion of Bullet 4: "Travelling Showpeople site for 13 serviced plots". Reinstatement of this requirement at Strategic Growth Site Policy 6 North East Chelmsford (Chelmsford Garden Community). Paragraph 7.358 to be amended as follows: 7.358 As this is a Strategic Growth Site and in order to achieve a mixed and balanced new community, the development will be required to provide two Gypsy and Traveller sites, each for 10 pitches, within the Strategic Growth Site allocation, as shown on the Policies Map. The location of the sites will be determined through the masterplanning process. These sites will be serviced i.e. provided with services such as water, waste disposal and electricity. It is expected that the Gypsy and Traveller sites will be delivered through a comprehensive approach, such as with a Registered Housing Provider. Reason: to make the policy effective (deliverable) and justified (appropriate and evidenced). Please refer to the PDF for our full Written Representations including a full markup of the policy amendment.

Q4 If your representation is seeking a change, do you consider it necessary to take part and speak at the Examination?
Yes

Q4a If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:
See statement in introduction to Site 16a.

Attachments

Written Representations - Wates and Hammonds Estates.pdf (16)

Stakeholder: Wates Developments and Hammonds Estates LLP (872955)
Comment ID: PS25-249
Consultation Point: Site 16a

Representation

Q3 Do you consider the Local Plan 'sound'?
Yes

Please provide an explanation below and identify the main issues.
East Chelmsford Garden Community is the subject of an innovative set of proposals formed around promoting sustainable and active travel behaviours, and providing sustainable movement and connectivity, as outlined fully in the submitted Transport and Connectivity Strategy and reflected in the Vision and Concept Masterplan. We welcome the requirement to target a 60% share for active and sustainable transport modes which can be supported by our proposed measures, including provision of a new A12 bus and cycle bridge, and a sustainable connectivity corridor that links East Chelmsford Garden Community to the City Centre and to Beaulieu Park station. The submitted Transport and Connectivity Strategy describes how the movement and access strategies proposed in response to the policy requirements can be delivered, and how the Garden Community will link into existing and proposed wider development and connections, encourage internal trip generation through a mix of onsite uses, and provide high-quality movement options to encourage modal shift. This demonstrates how the draft allocation accords with the NPPF requirement that “significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes” (Paragraph 109). As such, the policy measures within Bullets 4, 5 and 7 that seek to ensure new/enhanced routes are integrated with existing active travel networks to provide suitable connections to nearby settlements, employment and recreational opportunities are supported. The full text of our Written Representations is provided as an attached PDF. The supporting documents referred to are attached to our main response under Site Policy 16a.

Q4 If your representation is seeking a change, do you consider it necessary to take part and speak at the Examination?
Yes

Q4a If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:
See statement in introduction to Site 16a.

Attachments

Written Representations - Wates and Hammonds Estates.pdf (20)
Transport & Connectivity Strategy.pdf (2)
Vision and Concept Masterplan - 2025 Update.pdf (3)

Stakeholder: Wates Developments and Hammonds Estates LLP (872955)
Comment ID: PS25-251
Consultation Point: Site 16a, Para 7.367

Representation

Q3 Do you consider the Local Plan 'sound'?
No

If no, this is because you consider the Local Plan is NOT:
Justified;

Please provide an explanation below and identify the main issues.
Bullet 10 and Paragraph 7.367 refers to the need to 'Provide Bus Based Rapid Transit Infrastructure'. As part of representations submitted to the Regulation 18 consultation, support was expressed for some of the bus-based infrastructure measures described in supporting paragraphs, but concern raised at the principle within paragraph 7.367 that the masterplan should provide a "choice of unimpeded route corridors within the developed area, able to carry rapid transit services", with the need to determine "a preferred-route corridor through the development". Essex County Council's website helpfully defines a rapid transit system as "a transport system which has priority over other forms of transport. This can mean priority in traffic, on a dedicated lane alongside traffic, or on a rapid transit corridor separated from traffic." Alongside other international definitions, this is a useful specification as it accounts for alternative types of provision, ranging from priority at signals to dedicated or segregated corridors. As it is not appropriate to pre-judge the nature of the rapid transit measures that will be most suitable for the East Chelmsford Garden Community development at this stage, we consider it essential that Paragraph 7.367 be updated. Our concern is that the current wording overstates the need for an unimpeded corridor, which at this stage is not justified by evidence. We consider that bus/public transit priority can be achieved through a combination of measures, including the masterplan layout not providing a direct vehicular connection through the site; controls via bus gates or other restrictions as necessary; and the provision of a dedicated bus / cycle bridge over the A12 offering rapid transit to the city centre. It is also agreed that a key objective is to prevent vehicles rat-running from north to south through the Garden Community to bypass the A12, whilst prioritising bus/transit travel as a convenient and reliable mode of choice for local users. In our view, the current policy wording unnecessarily limits future options within a development that will take many years to deliver, and should be broadened to enable the appropriate strategy to be determined to respond to prevailing circumstances, and through subsequent planning stages. At present, the Transport and Connectivity Strategy sets out that an orbital bus service connecting East Chelmsford Garden Community, the city centre and Beaulieu Park station is an appropriate and feasible means of achieving rapid transport as desired, but the strategy should be able to remain live to changing technologies and approaches. The full text of our Written Representations is provided as an attached PDF. The supporting documents referred to are attached to our main response under Site Policy 16a.

Please set out the changes you consider necessary to make the Local Plan 'sound' including revised wording of any policy or text.
The following modification would correct this issue: Paragraph 7.367: See attached PDF for formatted proposed modification. Reason: to make the policy sound in terms of being justified (an appropriate strategy) with the appropriate level of flexibility for future planning stages.

Q4 If your representation is seeking a change, do you consider it necessary to take part and speak at the Examination?
Yes

Q4a If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

See statement in introduction to Site 16a.

Attachments

Written Representations - Wates and Hammonds Estates.pdf (21)
Transport & Connectivity Strategy.pdf (3)

Stakeholder: Wates Developments and Hammonds Estates LLP (872955)
Comment ID: PS25-252
Consultation Point: Site 16a, Para 7.363

Representation

Q3 Do you consider the Local Plan 'sound'?
Yes

Please provide an explanation below and identify the main issues.
Bullet point 11 and Paragraph 7.363 deal with securing improvements to the local and strategic road network as required by the Local Highways and Transportation Authority and National Highways. This is specified as “to include necessary improvements to Junctions 18 and 19 of the A12, A414, and route enhancements to A1060 (Maldon Road) and A1114 (Essex Yeomanry Way)”. Collaborative discussions involving the promoters of East Chelmsford Garden Community with Chelmsford City Council, Essex Highways (and their transport advisers Jacobs), and National Highways (and their transport advisers AECOM) are ongoing in relation to the transport infrastructure required to support the site. A Traffic Modelling Overview report is submitted with these representations that appraises the Local Plan Review evidence base and matters relating to the Local Plan Review’s impact on the strategic highway network, including traffic arising from the proposed delivery of East Chelmsford Garden Community. It is supported by Microsimulation modelling of Junctions 17, 18 and 19 of the A12 carried out by Wates’ consultants SLR. This work has been undertaken at the Council’s request to address National Highways request at Regulation 18 consultation stage and assist in assessing the impacts of the Local Plan Review on the A12 and the strategic highway network. Essex Highways (EH) and its consultants Jacobs has produced an updated traffic modelling study, contained in the Transport Impact Appraisal of the Local Plan Review Pre-Submission (December 2024). This provides commentary on the operation of the transport network both before and after the Local Plan Review proposed allocation sites are considered and informs the Council of the potential traffic impact of the Local Plan Review. The Microsimulation modelling completed by SLR is considered complementary in the context of providing results based on a range of potential future scenarios. This provides additional detail to supplement the conclusions drawn from EH’s strategic VISUM modelling work. At this stage, the work completed is considered proportionate and appropriate for the purpose of informing judgements on the potential effect of the Local Plan Review traffic growth on the key A12 junctions. The analysis set out in the submitted Traffic Modelling Overview demonstrates a strong correlation between the modelling which has been produced by EH and the outputs which have been extracted from the SLR Microsimulation modelling. The evidence concludes that for East Chelmsford Garden Community (Hammonds Farm) to be acceptable in highways terms, junction improvements at A12 Junction 18 would be required, and a scheme concept has been tested through the model and put forward in the submitted Transport and Connectivity Strategy. A junction improvement scheme at Junction 19 is currently the subject of an approved scheme via the A12 Chelmsford to A120 Widening Scheme Development Consent Order (the A12 DCO), which is related to traffic growth derived from the existing consented and allocated developments, including the 6,250 homes with masterplan approval at North East Chelmsford. The evidence identifies that there are congestion issues at Junction 17, but the consequence of these issues is not deemed severe in accordance with the NPPF. They are confined to the local road network, and the inclusion of the LPRPS traffic growth does not change the situation. Essex Highways (EH) has also acknowledged that it will work in partnership with National Highways outside of the Local Plan Review process to identify solutions for this junction. As an appropriate scheme is identified at Junction 18, which the promoters of Hammonds Farm can deliver, the modelling indicates that the impact of the traffic growth associated with the LPRPS sites can be effectively managed. The results of the Council’s evidence base and SLR’s Microsimulation modelling, therefore demonstrate that the outcome of the Local Plan Review would not cause an unacceptable impact on highway safety, nor cause impacts to the road network

that would be severe. The NPPF Paragraph 115 test is therefore satisfied. The findings of the Traffic Modelling Overview are that the Local Plan Review evidence base sets an appropriate basis for determining the likely infrastructure improvements to the local and strategic road network. The policy makes clear provision that such improvements will be secured in line with Policy S9 Infrastructure Requirements and its supporting text Paragraph 6.91, that “more detailed analysis of traffic impacts and mitigation options testing will be required through the preparation of Transport Assessments/Statements as part of future planning applications”. At the outline planning application stage, the Transport Assessment for East Chelmsford Garden Community (Hammonds Farm) will establish the basis for the highways infrastructure required to meet the needs of the development, alongside delivery timelines in agreement with Essex Highways and National Highways. Specific works will be secured and controlled via S106 and S278 Agreement to ensure timely phasing and delivery of necessary transport infrastructure and other measures. The policy is considered to be compliant with the NPPF requirements, and the Local Plan Review justified by appropriate highways evidence. The full text of our Written Representations is provided as an attached PDF. The supporting documents referred to are attached to our main response under Site Policy 16a.

Q4 If your representation is seeking a change, do you consider it necessary to take part and speak at the Examination?
Yes

Q4a If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:
See statement in introduction to Site 16a.

Attachments

Written Representations - Wates and Hammonds Estates.pdf (19)
Traffic Modelling Overview.pdf (2)

Stakeholder: Wates Developments and Hammonds Estates LLP (872955)
Comment ID: PS25-253
Consultation Point: Site 16a

Representation

Q3 Do you consider the Local Plan 'sound'?
No

If no, this is because you consider the Local Plan is NOT:
Justified; Effective;

Please provide an explanation below and identify the main issues.
East Chelmsford Garden Community has been proposed from the outset as a scheme that will pay proper regard to the character and sensitivities of the site and its local context. These principles and strategies are set out in the submitted Green Infrastructure Strategy and the supporting Landscape and Visual Baseline Appraisal, Archaeological and Heritage Appraisal, and Ecological Appraisal. This suite of documents demonstrates how the proposed development can be achieved within the site, based on a thorough appraisal of constraints and opportunities. Of high importance is the delivery of a Country Park, that will serve Chelmsford in opening up access to the Chelmer Valley and creating a place where access to nature, biodiversity net gain and habitat protection can be planned and delivered. It is noted that this section of the policy has been strengthened considerably to address consultation responses from Historic England and Natural England, in order to secure mitigation that enables sustainable development. This approach is largely supported and enables confidence in the allocation to come forward. The suite of policies in this section is therefore broadly supported, but there are aspects that require modification for soundness as set out below - these are submitted under separate entries to the following supporting paragraphs. The opening paragraph of the policy refers to the Garden Community having a landscape led setting, which is supported. Paragraph 7.368 refers to designing a high quality development in a landscape setting, and refers to the Council’s landscape evidence to inform this approach. At Regulation 18 stage we submitted our own Landscape and Visual Baseline Appraisal evidence to supplement the Council’s high level analysis (undertaken in 2017), and this has been updated to appraise the policy objectives relating to landscape and the natural environment defined in the Pre-Submission Local Plan Review. Our work is further supplemented by a Green Infrastructure Strategy, articulating our approach. Drawing upon our more localised landscape sensitivity and capacity analysis, we form the conclusion that Site 16a is wholly suitable for development from a landscape and visual perspective, and that a high quality development in a landscape setting, working in sympathy with local landscape and heritage assets, is achievable and deliverable. The full text of our Written Representations is provided as an attached PDF. The supporting documents referred to are attached to our main response under Site Policy 16a.

Please set out the changes you consider necessary to make the Local Plan ‘sound’ including revised wording of any policy or text.
See other points.

Q4 If your representation is seeking a change, do you consider it necessary to take part and speak at the Examination?
Yes

Q4a If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:
See statement in introduction to Site 16a.

Attachments

Written Representations - Wates and Hammonds Estates.pdf (22)
Landscape and Visual Baseline Appraisal - 2025 Update.pdf (1)
Green Infrastructure Strategy.pdf (1)

Stakeholder: Wates Developments and Hammonds Estates LLP (872955)
Comment ID: PS25-254
Consultation Point: Site 1w, Para 7.37

Representation

Q3 Do you consider the Local Plan 'sound'?
No

If no, this is because you consider the Local Plan is NOT:
Justified; Effective; Consistent with national policy;

Please provide an explanation below and identify the main issues.
a) Historic and Natural Environment Bullet 3 – new bridge crossing Under the Site Policy 16a Historic and Natural Environment heading, Bullet 3 has been adjusted in the Pre-Submission Local Plan Review to require a “sensitively designed new bridge to mitigate harm” in relation to the Chelmer and Blackwater Navigation Conservation Area. We support and understand the importance of this policy requirement and recognise that the proposed Multi Modal Bridge crossing of the Chelmer, providing connectivity and access to Junction 19 and Beaulieu Park rail station, will need to be sensitively designed to protect and enhance the heritage setting and avoid harm, as referenced in both the council’s evidence base and our submitted heritage appraisal. We therefore support the wording as being sound and refer to our evidence presented in the Bridge Option Summary, a multidisciplinary appraisal of the three proposed bridge structures appended to the submitted Transport and Connectivity Strategy, that this is achievable. Illustrative sketches of the potential appearance and scale of the crossing structure are also presented, and the submitted Archaeological and Heritage Appraisal considers the impacts of the three proposed bridges on heritage assets including the Conservation Area. This evidences that this policy requirement has been subject to early testing and is considered feasible in heritage, flood, transport and landscape terms. This part of the policy is therefore supported. b) Bullets 3, 4, 5, 6, 7, 8 and 9 and Paragraph 7.370– heritage assets Bullet points 3, 4, 5, 6, 7, 8 and 9 each include a requirement to preserve, enhance or retain the significance of particular heritage assets. This is a rather binary approach, which we do not consider is fully consistent with the NPPF, or with Council’s draft Policies DM13, DM14 and DM15, which are themselves in line with the NPPF’s heritage tests. To rectify this soundness issue, these bullets could either be removed entirely, as the issue is covered by the Council’s development management policies, or it should be clear that the assessment of these assets’ treatment will be governed by draft Policies DM13, DM14 and DM15. Those policies allow that, whilst there is a presumption in favour of preserving or enhancing the significance of a heritage asset, there are occasions where harm can be justified and the benefits of implementing development would outweigh the level of harm. c) Paragraph 7.370 refers to the adequate mitigation of impacts to heritage assets, which is supported. An Archaeological and Heritage Appraisal was provided in support of our submitted Regulation 18 representations. This responded to the Council’s published Heritage Assessment Technical Note for Hammonds Farm (March 2024), and included a commentary around the assumptions offered regarding the setting of heritage assets, including the importance of views to and from assets. This submitted Appraisal was used to inform the illustrative masterplan and has been further updated to support these Reg 19 representations. It remains our view that the Council’s evidence overestimates the potential effect of the allocation on heritage assets. The more detailed submitted Appraisal undertaken by heritage consultants EDP, which provides a more lengthy discussion of the assets in question, their significance and the contribution made by their setting, and with the benefit of having the illustrative masterplan and other evidence submitted to support the Site’s allocation, is able to make a more accurate and lower identification of potential harm that is more in line with the NPPF approach. The submitted Appraisal provides our view and supplementary commentary that with sensitive design and masterplanning measures in place, the allocation of the site can avoid or minimise harm to heritage assets to an overall lower

level than that currently predicted by the Council's evidence, and therefore be capable of achieving the requirements of policies DM13, DM14 and DM15. d) Bullet 5 – listed buildings Bullet point 5 includes a requirement to preserve and where appropriate enhance the "listed buildings, structures and setting" of a range of listed heritage assets. This part of the policy is not accurate, as only one of the quoted heritage assets (the Grade II listed Hammonds Farmhouse) physically falls within the allocation boundary. In relation to the other 14 assets quoted, the only element the allocation will have control over is the "setting" (the surroundings in which the heritage asset is experienced) where it overlaps with the allocation. e) Bullet 9, Paragraphs 7.370, 7.372 and Policies Map – Graces Walk and Hurrells Lane Bullet 9 refers to the need to "retain the significance of Hurrells Protected Lane and Graces Walk which both go through the site by providing substantial linear landscape buffers." Supporting text at Paragraphs 7.370 includes detailed explanation of the need for the masterplan layout to incorporate compensation measures for impacts on the development on the landscape and in relation to heritage asset settings and place distinctiveness and makes reference to "extensive" buffers. Later in the supporting text, Paragraph 7.373 states that: "The masterplan process will establish the detailed preservation and enhancement principles for this site." We support the purpose of Bullet 9 which is to retain the significance of Graces Walk and Hurrells Lane, but there does not appear to be evidence that buffers should be either "substantial" or "extensive", and consider that this pre-judges the outcome of the masterplan process, which is acknowledged to be the appropriate stage to establish the site's detailed preservation and enhancement principles (Paragraph 7.373). Our concern is that bringing a 'substantial buffer' into the heart of the masterplan would cause safety issues from a lack of overlooking and lighting, and unhelpfully divide the land uses such as education, employment and housing, leading to residents opting to use cars for short journeys rather than by bike or on foot. It also unduly sacrifices development land which could be contributing to meeting housing need. The full text of our Written Representations is provided as an attached PDF. The supporting documents referred to are attached to our main response under Site Policy 16a.

Please set out the changes you consider necessary to make the Local Plan 'sound' including revised wording of any policy or text.

a) Bullet 3 - no change, policy supported. b) Bullets 3, 4, 5, 6, 7, 8 and 9 and Paragraph 7.370– heritage assets It is suggested that qualifying text is added to Paragraph 7.370 of the supporting text, as follows: "Where the allocation would affect any heritage assets, including archaeological remains, the decision-making process outlined in Policies DM13, DM14 and DM15 (as appropriate) will be followed". Reason: to achieve soundness in terms of consistency with the NPPF. c) No change d) We suggest a modification is required to adjust the references for accuracy to the 'listed building and structures', except in the instance of the Grade II listed Hammonds Farmhouse, as follows: Bullet 5: "Preserve and where appropriate enhance the listed building and setting of Hammonds Farmhouse, and the settings of the following listed buildings, including Cuton, Stonhams and Little Baddow Locks, Phillows Farmhouse, The Congregational Chapel and Manse, Yew Tree Cottage, St Mary's Church, Little Baddow Hall, Boreham House, Generals, Water Hall, St Johns the Baptist Church Danbury, Little Graces, and Great Graces group of listed buildings." Reason: for accuracy and to achieve soundness in terms of effectiveness (deliverability). e) Bullet 9, Paragraphs 7.370, 7.372 and Policies Map – Graces Walk and Hurrells Lane For consistency across the policy, we suggest replacement of "substantial" and "extensive" with "appropriate", as used in Bullet 5. In conjunction with this proposed policy modification, our representations request that the Policies Map is adjusted to specify that the areas indicating these landscape buffers, notated as "Area for Conservation/Strategic Landscape enhancement", are illustrative. Statute and case law confirms that the Policies Map does not form part of the development plan but interprets policy in the development plan, whilst Regulation 9 of the Local Plan Regulations 2012 stipulates that the text prevails if the map and text conflict. We therefore suggest that additional text, 'not withstanding what is shown on Policies Map', is added to Bullet 9 so it is clear that the map illustration does not over-reach the policy. Amend Bullet 9 as follows: Retain the significance of Hurrells Protected Lane and Graces Walk which both go through the site by providing appropriate linear landscape buffers, not withstanding what is shown on Policies Map Amend Paragraph 7.370: "Layout should incorporate compensation measures for impacts from the development on the landscape, preserve the setting of heritage assets and create a distinct new place. Compensation measures will include

appropriate landscaped edges, tree and hedge planting along countryside edges and green buffers to respect the amenities of adjoining residential properties. The site plays an important role in the rural setting to a number of designated and non-designated heritage assets in the wider area. There are also significant views to Danbury and Little Baddow Churches. It will be important to ensure the impacts on heritage setting are adequately mitigated, which will include landscape buffers in appropriate locations. This should include the creation of viewing corridors to historic landmarks. Historic lanes, field boundaries and the Graces Walk avenue are important features of this context, which should be retained and enhanced. There will be impacts to the setting of the Chelmer and Blackwater Navigation due to the change from a rural to urban context. It will be important to mitigate these impacts and provide landscape enhancement as part of a scheme of compensatory measures. This should include buffer zones alongside rivers, reserved as public space. Heritage, social history and natural environment celebration and interpretation should play a positive role in reinforcing local character and promote heritage and understanding such as the works of renowned local nature writer J. A. Baker who has connections with this area." Paragraphs 7.371 and 7.372: Swap the order of these paragraphs, so that it is clear that the requirement in current Paragraph 7.372 relates more clearly to Paragraph 7.370. Modifications to the Proposals Map drawing / notation is raised elsewhere in these representations. Reason: to make the policy sound in terms of its appropriateness and justified by evidence. See submitted PDF for full marked up changes to the policy wording.

Q4 If your representation is seeking a change, do you consider it necessary to take part and speak at the Examination?
Yes

Q4a If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:
See statement in introduction to Site 16a.

Attachments

Written Representations - Wates and Hammonds Estates.pdf (23)
Transport & Connectivity Strategy.pdf (4)
Archaeological and Heritage Appraisal - 2025 Update.pdf (1)

Stakeholder: Wates Developments and Hammonds Estates LLP (872955)
Comment ID: PS25-256
Consultation Point: Site 16a, Para 7.375

Representation

Q3 Do you consider the Local Plan 'sound'?
No

If no, this is because you consider the Local Plan is NOT:
Effective;

Please provide an explanation below and identify the main issues.
a) Bullet 10 refers to the Policies Map, and states that the area to the east of Sandon Brook, which lies within the allocation boundary and is notated as space for “Recreation/SuDS/Biodiversity” should, in relation to this site, “focus on informal recreation, natural and semi natural green infrastructure uses rather than formal sports recreation requiring floodlighting or significant servicing.” Our assessment of the appropriate role for this land is that it could partially provide semi-natural green space to act as mitigation against potential recreational pressure upon the Sites of Special Scientific Interest (SSSIs) that lie to the east of the site at the Danbury Ridge, whilst the balance could be suitable for solar or appropriate renewable energy generation, to support the masterplan’s ability to work towards net zero carbon (we have elsewhere referred to this land’s potential for residential use should the Council wish to consider it). The submitted Green Infrastructure Strategy outlines a potential concept for this recreational mitigation approach and illustrates a potential spatial distribution. It is considered that the policy should enable the residual balance of the land after SSSI mitigation to be available for consideration at the masterplan stage for the accommodation of solar or other appropriate renewable energy uses, which is deemed a wholly appropriate and complementary use for this land. Policy DM19 of the Local Plan Review, and the Council’s Solar Farm SPD (November 2021), recognise the valuable contribution that such development can make to addressing the climate crisis. At this stage it is considered that solar provision in this area can satisfy the tests set out in Policy DM19 regarding environmental impacts, and for maximum benefit can be co-located with biodiversity enhancements. b) Bullet 20 and Paragraph 7.375 – Biodiversity Net Gain Bullet 20 requires the provision of “a minimum of 20% biodiversity net gain above the ecological baseline in accordance with Policy DM16”, applied specifically to the Garden Communities, with Paragraph 7.375 noting that “the opportunity exists to achieve 20% biodiversity net gain subject to site constraints” due to their scale. The application of a higher policy target to the Garden Communities than other site allocations in the plan is broadly accepted, in recognition of their scale and the ability to achieve a high level of onsite green infrastructure. Early calculations indicate that this target would be achievable; however, this is on the basis of clarifications and modifications discussed below and subject to viability. As suggested by Paragraph 7.375’s wording of “subject to site constraints”, we interpret that this higher policy requirement [ie above the statutory requirement] is specifically limited to what is practically deliverable onsite, and must not invite expectation that offsite provision or credit top ups could be sought to reach the higher target value of 20%. These would hamper viability. The market for BNG units is still developing, since mandatory net gain has only been in place for a year. In justifying an increased target value, there should be a consideration of the limited supply of units for habitats that are more challenging to create / enhance, such as watercourse units. The supply of such units or availability of off-site areas for offsetting, with the additional burden of an elevated BNG target, may prove restrictive to the deliverability of strategic allocations. Further representations on this are made to Policy DM16, in relation to the interplay of BNG and SANG. The full text of our Written Representations is provided as an attached PDF. The supporting documents referred to are attached to our main response under Site Policy 16a.

Please set out the changes you consider necessary to make the Local Plan 'sound' including revised wording of any policy or text.
a) The following amendment to Bullet 10 is sought so as not to unduly constrain the opportunity for appropriate land uses to be considered as part of the future land use mix, and in order that Site 16a can support the achievement of other policies in the plan: Bullet 10: The area to the east of Sandon Brook notated on the Policies Map for Future Recreation/SuDS/Biodiversity should focus on informal recreation, natural and semi natural green infrastructure uses as well as solar/appropriate renewable energy uses rather than formal sports recreation requiring floodlighting or significant servicing. Reason: to ensure the stated policy is effective in supporting the delivery of the plan's policies as a whole. b) In order to match the site policy 16a bullet 20 wording to what is stated in Paragraph 7.375 and for clarity, we request the following modification is made: Bullet 20 – Provide a minimum of 20% biodiversity net gain above the ecological baseline in accordance with Policy DM16, capped at what can be practically delivered onsite Paragraph 7.375 Given the scale of the Garden Communities, the opportunity exists for these developments to achieve 20% biodiversity net gain subject to site constraints and to be capped at what can be practically delivered onsite. Reason: to ensure that the policy is deliverable (ie effective).

Q4 If your representation is seeking a change, do you consider it necessary to take part and speak at the Examination?
Yes

Q4a If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:
See statement in introduction to Site 16a.

Attachments

Written Representations - Wates and Hammonds Estates.pdf (24)
Green Infrastructure Strategy.pdf (2)
Preliminary Ecological Appraisal PS.pdf

Stakeholder: Wates Developments and Hammonds Estates LLP (872955)
Comment ID: PS25-257
Consultation Point: Site 16a, Para 7.377

Representation

Q3 Do you consider the Local Plan 'sound'?
No

If no, this is because you consider the Local Plan is NOT:
Justified;

Please provide an explanation below and identify the main issues.
In principle we support the requirement to provide necessary mitigation in relation to cumulative recreational pressure on local SSSIs, recognising the need for their protection and their ecological value. However, supporting paragraph 7.377 refers to providing semi-natural greenspace to 'meet Natural England's 8ha/1000 new population metric and minimum circular dog-walking route on or off site of 2.3km'. If this scale of mitigation is to expected in relation to the local SSSIs, the area provided must be able to double up as Suitable Alternative Natural Greenspace (SANG) if such is required for potential recreational impacts on the Blackwater Estuary SPA (as discussed in Paragraph 8.139 of policy DM16). The full text of our Written Representations is provided as an attached PDF. The supporting documents referred to are attached to our main response under Site Policy 16a.

Please set out the changes you consider necessary to make the Local Plan 'sound' including revised wording of any policy or text.
It is proposed that an additional sentence is added for clarification to Paragraph 7.377 as follows: Paragraph 7.377 - The provision of this quantum of greenspace would simultaneously provide recreational mitigation for potential impacts on the Essex Coast international designations, if required as identified in paragraph 8.139 of DM16. Reason: in order to ensure the stated policy is effective in achieving delivery of the plan policies as a whole.

Q4 If your representation is seeking a change, do you consider it necessary to take part and speak at the Examination?
Yes

Q4a If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:
See statement in introduction to Site 16a.

Attachments

Written Representations - Wates and Hammonds Estates.pdf (25)

Stakeholder: Wates Developments and Hammonds Estates LLP (872955)
Comment ID: PS25-258
Consultation Point: Site 16a

Representation

Q3 Do you consider the Local Plan 'sound'?
No

If no, this is because you consider the Local Plan is NOT:
Justified; Consistent with national policy;

Please provide an explanation below and identify the main issues.
a) Bullet 18 requires the development to “undertake an Archaeological Assessment and conserve existing archaeological features”. This requirement to “conserve existing archaeological features” is a sweeping approach, and could be interpreted to imply that all archaeological remains found within the site would be of such a high level of significance that they would warrant retention. The archaeological remains on site will vary in significance from very low, such as post-medieval field boundaries, to higher levels, such as evidence for earlier settlement. However, based on the information thus far presented by the Council and the promoter, including the results of a geophysical survey and trial trenching, which is detailed in the submitted Archaeological and Heritage Appraisal, there is no current evidence that demonstrates any remains on site are of such a high level of significance (i.e. equivalence to a scheduled monument, as per Footnote 75 of the NPPF) that such mitigation (preservation in situ) could be warranted. b) Paragraph 7.384 refers to the site’s potential to contain archaeological deposits, and states that, in terms of archaeological significance, “Of particular interest” are cropmarks to the north of Rumbolds Farm. On the contrary, these cropmarks have been investigated through both geophysical survey and some, albeit limited, trial trenching, and thus far have only indicated remains related to post-medieval farming practices. Other marks have yet to be linked to any identifiable underlying remains and may be of alternate origins, e.g. geology or modern farming. The only other archaeology confirmed in this location through the trial trenching is a shallow and truncated pit or tree throw containing some Roman pottery and residual flint flakes, and a single shallow and truncated posthole containing a residual flint flake, which do not suggest remains of high significance. Therefore, based on this evidence, it is notable that despite investigations specifically looking for evidence of buried remains related to these cropmarks, as yet none have been found, apart from where they relate to post-medieval field boundaries of negligible significance. Instead of being of ‘particular interest’, these cropmarks appear likely to be the result of a mixture of archaeological and non-archaeological processes, and a mixture of dates and functions, and are yet to be proven to be of anything more than very low levels of significance. In terms of archaeological remains more generally, in line with Policy DM15 many of the archaeological remains in the site are unlikely to be desirable to retain or may justifiably be mitigated through archaeological fieldwork (as opposed to preservation in situ) where the benefits of delivering development will outweigh the harm. The full text of our Written Representations is provided as an attached PDF. The supporting documents referred to are attached to our main response under Site Policy 16a.

Please set out the changes you consider necessary to make the Local Plan ‘sound’ including revised wording of any policy or text.
a) The current wording not considered sound as it is not justified by evidence or consistent with national policy. Furthermore, as these matters are adequately dealt with by Policy DM15 (Archaeology), we consider that the bullet point should either be corrected to remove the unsoundness, or be removed entirely: Bullet 18: Undertake an Archaeological Assessment and conserve existing archaeological features - either remove entirely, or delete the words "and conserve existing archaeological features" Reason: to make the policy sound in terms of being justified by the evidence presented in the Council’s assessment and the submitted Archaeology and

Heritage appraisal, and to ensure that the approach is consistent with the NPPF's heritage policy tests. b) We request the following modification to make the policy sound: Amend Paragraph 7.384 as per the proposed modification set out in the attached PDF document . Reason: to ensure that the policy is justified in terms of evidence, and consistent with national policy. See submitted PDF for full marked up changes to the policy wording.

Q4 If your representation is seeking a change, do you consider it necessary to take part and speak at the Examination?
Yes

Q4a If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:
See statement in introduction to Site 16a.

Attachments

Written Representations - Wates and Hammonds Estates.pdf (28)
Archaeological and Heritage Appraisal - 2025 Update.pdf (2)

Stakeholder: Wates Developments and Hammonds Estates LLP (872955)
Comment ID: PS25-260
Consultation Point: Site 16a

Representation

Q3 Do you consider the Local Plan 'sound'?
No

If no, this is because you consider the Local Plan is NOT:
Justified;

Please provide an explanation below and identify the main issues.
a) Bullets 1-3 deal with the allocation's onsite education provision, supported by Paragraphs 7.361 and 7.362. We support the onsite provision of schools and early years facilities, for which the quanta of facilities and associated land take are specified in the policy, with provision of suitable land identified in the concept masterplan. To make the policy sound we consider that reference should be added to the education provision being proportionate to pupil yield generated from the development, so that its delivery and funding at the time allows for Section 106 contributions from other developments locally to contribute as required. b) Given that the requirement for school places may change over time, it is suggested that additional text enabling some flexibility without reducing the objective is added to Paragraph 7.361. c) Primary healthcare provision at East Chelmsford Garden Community is supported as part of the scheme's holistic provision of community facilities, and we would welcome the opportunity, should a new GP surgery for the East Chelmsford area (as envisaged by the Council's IDP) need to be delivered, for it to be located on the Garden Community site, supported by contributions from other qualifying developments. The following text is considered necessary to clarify the requirement in relation to healthcare provision, as the on-site healthcare and contributions must be limited to primary healthcare; there is no justification for strategic health needs to be met via planning obligations. A new requirement has also been introduced for facilities to support police, ambulance, fire and rescue facilities. We seek the removal of the requirement, as it is too broad and needs to be specific and evidenced. d) Modification is also requested to Paragraph 7.361 in relation to an upper limit placed on the size of a proposed convenience store, as 500sqm. For the purpose of supporting internal trips within the garden community and minimising vehicle trips offsite, a larger food store is expected to be needed. It is considered premature to determine its size at this stage, but 2,500sqm could be an appropriate size. Our preference is to remove the size limit entirely. The full text of our Written Representations is provided as an attached PDF. The supporting documents referred to are attached to our main response under Site Policy 16a.

Please set out the changes you consider necessary to make the Local Plan 'sound' including revised wording of any policy or text.
a) Bullet 1 - A new secondary school (Use Class F1(a)) on 10.1 hectares co-located with primary school (Use Class F1(a)) and early years and childcare nursery (Use Class E(f)) on 2.1 hectares of suitable land allocated for education and childcare use, with funding proportionate to pupil yield from the Garden Community development. Bullet 2 - Two new primary schools (Use Class F1(a)) with co-located early years and childcare nursery (Use Class E(f)) each on 2.1 hectares of suitable land allocated for education and childcare use, with funding proportionate to pupil yield from the Garden Community development. b) Paragraph 7.361 – insert after sentence 2: Given that the precise requirement could flex over time, the equivalent land take for the provision of schools, early years and childcare nurseries to that defined in the policy must be provided to deliver the school places required in line with the needs identified at the time by the Local Authorities with Responsibility for Education (LARE). c) Amend Site Infrastructure Bullet 7: Provide and/or financial contributions to primary healthcare provision as required by the NHS Mid and South Essex Integrated Care Board to address the needs of the development. Reason: to make the policy sound in terms of accuracy and based on evidence (justified). d) To make the policy sound the following modifications are required:

Paragraph 7.361: The centres will need to make provision for community and primary healthcare facilities, as required by the NHS Mid and South Essex Integrated Care Board, and a main unit for convenience food shopping of an appropriate size. The planning and design of development is required to encourage healthy and active lifestyles, in line with Sport England and Public Health England's Active Design guidance. Reason: to ensure the policy is sound in terms of appropriateness and to support local plan objectives in relation to sustainable travel. See submitted PDF for full marked up changes to the policy wording.

Q4 If your representation is seeking a change, do you consider it necessary to take part and speak at the Examination?
Yes

Q4a If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:
See statement in introduction to Site 16a.

Attachments

Written Representations - Wates and Hammonds Estates.pdf (17)

Stakeholder: Wates Developments and Hammonds Estates LLP (872955)
Comment ID: PS25-262
Consultation Point: Site 16a, Para 7.362

Representation

Q3 Do you consider the Local Plan 'sound'?
No

If no, this is because you consider the Local Plan is NOT:
Justified;

Please provide an explanation below and identify the main issues.
Paragraph 7.362 states that: “The developer will be expected to provide the education land and a financial contribution.” To ensure the education provision meets the identified need created by the Garden Community development, and reflects the appropriate range of delivery scenarios, it is considered necessary to extend this sentence to reflect the option to deliver the school directly, as follows, which will be negotiated via the Section 106. The full text of our Written Representations is provided as an attached PDF. The supporting documents referred to are attached to our main response under Site Policy 16a.

Please set out the changes you consider necessary to make the Local Plan ‘sound’ including revised wording of any policy or text.
Paragraph 7.362: The developer will be expected to provide the education land and an appropriate financial contribution, which may include direct delivery of the school/s and associated facilities in accordance with ECC specification. Reasons: to ensure the policy provision reflects the identified need created by the Garden Community development, and the appropriate range of delivery scenarios. See submitted PDF for full marked up changes to the policy wording.

Q4 If your representation is seeking a change, do you consider it necessary to take part and speak at the Examination?
Yes

Q4a If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:
See statement in introduction to Site 16a.

Attachments

Written Representations - Wates and Hammonds Estates.pdf (18)

Stakeholder: Wates Developments and Hammonds Estates LLP (872955)
Comment ID: PS25-264
Consultation Point: Site 16a

Representation

Q3 Do you consider the Local Plan 'sound'?
No

If no, this is because you consider the Local Plan is NOT:
Effective;

Please provide an explanation below and identify the main issues.
A paragraph at the top of page 204 (between the Site Infrastructure and Stewardship sections) relates to the Council's encouragement of renewable energy, low carbon schemes and mass waste systems. This is supported and such systems are being considered as an integral part of the East Chelmsford Garden Community sustainability and energy strategy. However, such proposals may give rise to non-significant and/or short term impacts, and these should be dealt with proportionately. The full text of our Written Representations is provided as an attached PDF. The supporting documents referred to are attached to our main response under Site Policy 16a.

Please set out the changes you consider necessary to make the Local Plan 'sound' including revised wording of any policy or text.
Minor modifications are sought to ensure that the policy is not unduly onerous as to constrain its deliverability, as follows: "The Council will encourage the appropriate development of renewable, low carbon and decentralised energy schemes on this site together with mass waste collection systems where they are deliverable, appropriate, and do not give rise to significant adverse environmental or other significant amenity impacts." See submitted PDF for full marked up changes to the policy wording.

Q4 If your representation is seeking a change, do you consider it necessary to take part and speak at the Examination?
Yes

Q4a If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:
See statement in introduction to Site 16a.

Attachments

Written Representations - Wates and Hammonds Estates.pdf (26)

Stakeholder: Wates Developments and Hammonds Estates LLP (872955)
Comment ID: PS25-266
Consultation Point: Site 16a

Representation

Q3 Do you consider the Local Plan 'sound'?
No

If no, this is because you consider the Local Plan is NOT:
Effective;

Please provide an explanation below and identify the main issues.
This section of the policy is strongly supported, as a Stewardship Strategy will be a key component of the planning and delivery of East Chelmsford Garden Community. An outline of objectives for this strategy is set out in a chapter of the submitted Vision and Concept Masterplan. Two minor amendments to the policy are sought in relation to the timing of details and its deliverability. a) A full business plan is requested as part of the planning application process, but we note that this will only be able to be completed at condition or planning obligation this stage, because the detail of the potential assets, liabilities and costs will be subject to the detail agreed at Reserved Matters approval stage. A Draft or Framework Business Plan can be provided as part of the application process, which will: identify the broad scale and type of assets to be endowed or potentially endowed to a stewardship body; formalise the objectives of the stewardship body; provide likely options for governance structures and when they will be put in place, including interim or transition measures; identify sources of incomes and estimate scale of liabilities. A full business plan can be agreed as a condition or planning obligation, triggered when the information is available and the outcome of a planning application is known. b) The policy also refers to funding mechanisms to be used to support the Stewardship Body. Whilst we fully recognise the sensitivity over resident service charges, it is not appropriate for these to be capped in policy, as this is not financially sustainable in the long term. The principle of utilising other income sources is supported, and the leveraging of such opportunities through the careful planning of the stewardship model will ensure, as addressed in the requested modification, that activities will not be reliant on service charges alone. The full text of our Written Representations is provided as an attached PDF. The supporting documents referred to are attached to our main response under Site Policy 16a.

Please set out the changes you consider necessary to make the Local Plan ‘sound’ including revised wording of any policy or text.
a) The following modification is therefore sought for clarification: Bullet 3 - A Stewardship Strategy to be provided as part of the planning application process to include a) a robust governance strategy of the chosen stewardship vehicle, b) a Draft Business Plan for the chosen stewardship vehicle and c) arrangements for maintenance, management and monitoring of public spaces and community assets. Reason: to make the policy deliverable and proportionate to the planning stage. b) Amend Paragraph 7.355 - The Stewardship Body activities is expected to be funded through a blend of income generating assets, endowment and grant funding to ensure the activities are not reliant on service charges alone. Reason: to make the policy sound in terms of deliverability (effectiveness).

Q4 If your representation is seeking a change, do you consider it necessary to take part and speak at the Examination?
Yes

Q4a If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:
See statement in introduction to Site 16a.

Attachments

Written Representations - Wates and Hammonds Estates.pdf (14)

Stakeholder: Wates Developments and Hammonds Estates LLP (872955)
Comment ID: PS25-267
Consultation Point: Site 16a, Para 7.381

Representation

Q3 Do you consider the Local Plan 'sound'?
Yes

Please provide an explanation below and identify the main issues.
Paragraph 7.381 refers to the need to undertake a Minerals Resource Assessment at the planning application stage, which is accepted. We welcome the acknowledgement made of our previous Regulation 18 submission of a Minerals Assessment Report undertaken in 2023, which concludes that due to technical constraints, prior extraction of potential mineral reserves would only be feasible in areas which are due to be retained in an undeveloped form as green infrastructure, whereas prior extraction beneath areas proposed for built development would render the land undevelopable due to the presence of a high water table. This Minerals Assessment Report is resubmitted as evidence and the paragraph is acknowledged to be appropriate. The full text of our Written Representations is provided as an attached PDF. The supporting documents referred to are attached to our main response under Site Policy 16a.

Please set out the changes you consider necessary to make the Local Plan 'sound' including revised wording of any policy or text.
None.

Q4a If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:
See statement in introduction to Site 16a.

Attachments

Written Representations - Wates and Hammonds Estates.pdf (27)
Mineral Assessment Report.pdf (1)

Stakeholder: Wates Developments and Hammonds Estates LLP (872955)
Comment ID: PS25-269
Consultation Point: Site 16a, Para 7.354

Representation

Q3 Do you consider the Local Plan 'sound'?
No

If no, this is because you consider the Local Plan is NOT:
Consistent with national policy;

Please provide an explanation below and identify the main issues.
For consistency across the Local Plan Review, we note that Paragraph 5.28 has been amended to state that masterplans for strategic sites must be in place prior to the determination of any planning application, and that this specification is repeated for some of the strategic sites, such as Site 16b. For consistency and clarity, the same specification should be reflected in the site policy for Site 16a. The full text of our Written Representations is provided as an attached PDF. The supporting documents referred to are attached to our main response under Site Policy 16a.

Please set out the changes you consider necessary to make the Local Plan 'sound' including revised wording of any policy or text.
Paragraph 7.354: The site allocation is to be planned comprehensively in accordance with a masterplan approved by the City Council prior to the determination of any planning application. Reason: for consistency across the Local Plan and clarity.

Q4 If your representation is seeking a change, do you consider it necessary to take part and speak at the Examination?
Yes

Q4a If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:
See statement in introduction to Site 16a.

Attachments

Written Representations - Wates and Hammonds Estates.pdf (13)

Stakeholder: Wates Developments and Hammonds Estates LLP (872955)
Comment ID: PS25-301
Consultation Point: Map 3
Original CP where different: Draft Policies Map for Strategic Growth Site 16a East Chelmsford Garden Community (Hammonds Farm) a) Area for Conservation/Strategic Landscape Enhancement – Graces Walk and Hurrells Lane b) Land Allocated for Future Recreation Use and/or SuDS and/or Biodiversity - East of Sandon Brook c) Additional parcels – Sandford Mill Lane and Rumbolds Farm

Representation

Q3 Do you consider the Local Plan 'sound'?
No

If no, this is because you consider the Local Plan is NOT:
Justified; Effective;

Please provide an explanation below and identify the main issues.
a) We challenge the spatial indication of “Area for Conservation/Strategic Landscape enhancement” for Strategic Growth Site 16a East Chelmsford Garden Community (Hammonds Farm). Please refer to our corresponding representations on Bullet 9 of the Site 16a allocation policy for fuller details. We consider that it is premature for this map notation to define any scale for landscape buffers, which as the site policy states should be based on assessment at the masterplan stage. It should therefore be clarified through the corresponding amendments to the policy wording sought that any scale implied by the Policies Map is illustrative. This could also be amended on the map key. We also invite the authority to consider whether removal of the buffer entirely from the Policies Map would be the most appropriate way to rectify its soundness, given the policy text (which has primacy) sufficiently defines the need for buffers to be incorporated in the masterplan proposals. As the land involved already falls within the site allocation boundary, there is no reason for this buffer to be marked on the Policies Map. b) We seek an extension of the wording of the labelling used to define the land to the east of Sandon Brook, which is included within the allocation boundary, to encompass solar or other site-appropriate renewable energy provision alongside natural green space. Please refer to our corresponding representations on Site 16a Bullet 10. This would make the policy sound by enabling an appropriate set of uses for this land to be considered, which would assist in the delivery of the Council’s net zero policies. c) Two parcels of land within the site allocation boundary, referred to as Land Adjacent to Sandford Mill Lane and Rumbolds Farm, were not previously promoted as part of the built development area at earlier stages, but further work has identified that they would be developable, and could benefit the development’s phasing and overall flexibility and capacity to deliver the development. The loss of this land would not be detrimental to the Country Park and its purposes, given the parcel’s location at the far south western corner, and development would continue to retain the integrity of the green river corridor appropriately. Two Appendix sheets (Appendices 1A and 1B) demonstrate that the sites are unconstrained in planning terms: Land adjacent to Sandford Mill Lane (Appendix 1A) could accommodate circa 70-120 homes. This could come forward relatively early as it is not reliant on infrastructure upgrades, which would enable Site 16a to start contributing to Chelmsford’s housing needs within the first five years of the plan, and would financially support the wider scheme’s early infrastructure delivery. Rumbolds Farm (Appendix 1B) could accommodate an extension to the masterplan’s proposed employment area. It is an area of previously developed land with farm buildings. Its inclusion as a development parcel would help to mitigate against the removal of an area of employment land to the north of the Chelmer that was previously included at Preferred Option stage but has since been taken out of the plan. A modification to the Policies Map to add these parcels to the areas labelled as “New Garden

Community for Major Housing and Employment Development" would bring the Policies Map into line with the most recent evidence on the most appropriate use of the land. The full text of our Written Representations is provided as an attached PDF.

Please set out the changes you consider necessary to make the Local Plan 'sound' including revised wording of any policy or text.
On the basis of these representations, it is considered that the following modifications would make the policy sound by virtue of its effectiveness and justification by evidence: a) Notation for Area for Conservation/Strategic Landscape enhancement – delete this notation OR add wording it is illustrative in scale b) Amend Notation to read: Land Allocated for Future Recreation Use and/or SuDS and/or Biodiversity and/or Solar/Appropriate Renewable Energy Generation c) The Land Adjacent to Sandford Mill Lane and Land at Rumbolds Farm [ie as shown on submitted Appendices 1A and 1B of our Written Representations] to be transferred to the "New Garden Community for Major Housing and Employment Development" areas shown within the site boundary. Reason: to avoid introducing conflict with the Site 16a policy, and so that the Map is justified by appropriate evidence; and to contribute to housing, employment and energy delivery to support other policies in the Local Plan. The full markup of wording change is provided in the attached PDF.

Q4 If your representation is seeking a change, do you consider it necessary to take part and speak at the Examination?
Yes

Q4a If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:
We wish to attend the examination hearings to discuss the proposed modifications raised above. As a general point, should there be matters relating to Policy 16a to which we have not sought specific modifications but are the subjection of others' objections (on any of the policies), we would request attendance to address the Inspector directly to express support for the allocation and address any technical points.

Attachments

Written Representations - Wates and Hammonds Estates.pdf (29)

Stakeholder: Wates Developments and Hammonds Estates LLP (872955)
Comment ID: PS25-305
Consultation Point: Site 3B

Representation

Q3 Do you consider the Local Plan 'sound'?
Yes

Please provide an explanation below and identify the main issues.
We support the introduction of Bullet 2 under ‘Movement and Access’ of Site Policy 3b to provide a well connected internal road network “including safeguarding a north-south bus entry and egress through the site”. Supporting paragraph 7.156 outlines further justification for the safeguarded bus connection. This route is shown in the submitted Transport and Connectivity Strategy as the preferred route for the proposed bus/cycle/walking bridge over the A12 to tie into (as one of a number of route options available for the delivery of this connection). This will enable a rapid bus/transit connection from the Garden Community to the city centre, which will benefit the occupants of employment site 3b by introducing a bus service that directly serves the interior of their site and connects occupants to the amenities at East Chelmsford Garden Community as well as to the city centre. Initial testing has demonstrated the feasibility of this route connection. The policy is therefore strongly supported and no modifications are requested. The full text of our Written Representations is provided as an attached PDF. The supporting documents referred to are attached to our main response under Site Policy 16a or to this representation where expressly relevant.

Please set out the changes you consider necessary to make the Local Plan ‘sound’ including revised wording of any policy or text.
None.

Q4 If your representation is seeking a change, do you consider it necessary to take part and speak at the Examination?
Yes

Q4a If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:
Should this aspect of the policy be challenged we request attendance at the examination.

Attachments

Transport & Connectivity Strategy.pdf (1)
Written Representations - Wates and Hammonds Estates.pdf

Stakeholder: Wates Developments and Hammonds Estates LLP (872955)
Comment ID: PS25-306
Consultation Point: Site 6

Representation

Q3 Do you consider the Local Plan 'sound'?
No

If no, this is because you consider the Local Plan is NOT:
Justified; Effective;

Please provide an explanation below and identify the main issues.
Please refer to our representations on Strategic Policy S7 (Spatial Strategy) and Strategic Growth Site Policy 16a East Chelmsford Garden Community (Hammonds Farm) in relation to Gypsy, Traveller and Travelling Showpeople provision. Due to the case set out in those representations, which for brevity are not repeated here, we request the reinstatement of 13 Travelling Showpeople plots to Site Policy 6 and their deletion from Site 16a, in order to make the plan sound in terms of its deliverability and its justification as an appropriate strategy taking into account reasonable alternatives. It is considered that this provision can be adequately accommodated on planning grounds as part of the mix of uses to be delivered by the largest of the Garden Community sites. The full text of our Written Representations is provided as an attached PDF.

Please set out the changes you consider necessary to make the Local Plan 'sound' including revised wording of any policy or text.
The following are requested to make the plan sound in terms of appropriateness: Add bullet under Amount and Type of Development: Travelling Showpeople site for 13 serviced plots.

Q4 If your representation is seeking a change, do you consider it necessary to take part and speak at the Examination?
Yes

Q4a If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:
We wish to attend the examination hearings to discuss the proposed modifications raised above.

Attachments

Written Representations - Wates and Hammonds Estates.pdf

Stakeholder: Wates Developments and Hammonds Estates LLP (872955)
Comment ID: PS25-308
Consultation Point: Policy S2

Representation

Q3 Do you consider the Local Plan 'sound'?
Yes

Please provide an explanation below and identify the main issues.
We support the policy and its supporting text and evidence in relation to minimising the risk of flooding from development, and consider that the policy provides an appropriate basis on which to assess flood risk matters at the development management stage. The NPPF's policies on flood risk require 'inappropriate development in areas at risk of flooding [to] be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere' (Paragraph 165). Strategic policies should be informed by a Strategic Flood Risk Assessment (Paragraph 166), and a sequential, risk-based approach to the location of development must be applied (Paragraph 167). The authority's evidence base for the Local Plan Review includes a Strategic Flood Risk Assessment (SFRA) Level 1 and Level 2 undertaken by consultants JBA, and a Sequential and Exception Testing 2024 report and Focused Update (December 2024). Flood Risk has also been assessed through the Sustainability Appraisal. The East Chelmsford Garden Community (Hammonds Farm) site occupies areas of Flood Zones 1, 2 and 3, and as such it is appropriate that the evidence base supports the allocation of the site in flood risk terms, based on reasonable expectations at this stage that its development can be made safe from flooding, and will not increase flood risk elsewhere. To complement the Council's evidence and demonstrate the acceptability of the Hammonds Farm site in flood risk terms, an Flood Risk Strategy is submitted. As set out in that report, the flood performance of the high-level masterplan proposals has been tested in detail with a hydraulic model constructed in 2025. This uses a suite of new river cross section surveys of both the River Chelmer and Sandon Brook to provide an updated and accurate flood picture of the area, building upon existing EA models for both watercourses. Based on this technical work, there are no flood risk technical constraints identified that would impact the site's deliverability in flood risk terms,. Therefore, the NPPF and Strategic Policy S2 tests can be met. The development will be deliverable in flood risk and drainage terms based on the technical work reported, and with the supporting evidence base documents. Sequential and Exception Test As required by the NPPF and PPG, the council has undertaken a series of strategic flood risk assessment exercises to support successive plan-making stages and inform the spatial strategy, accompanied by a Sequential and Exception Testing report and Focused Update. The objective of sequential testing at the plan-making stage is to locate development in areas at lowest flood risk. As part of this assessment it remains open to a local planning authority to determine that there is a strategic need for the development notwithstanding its location within an area of flood risk, via assessment within its Sustainability Appraisal (according to steps 5 and 6 of PPG 7-007-20220825, dated 25 08 2022). NPPF23 Paragraph 168 states that development should not be allocated if there are reasonably available sites "appropriate for the proposed development" in areas with a lower risk of flooding, with the PPG reinforcing that reasonably available sites are those in a "suitable location for the type of development". The sequential test necessitates judgments based on suitability and appropriateness, as well as flood risk factors Specifically for Site 16a East Chelmsford Garden Community (Hammonds Farm), we agree with the Council's December 2024 Sequential and Exception Test Focused Update finding that as all of the housing and employment development can be directed sequentially to areas within the site boundary at the lowest risk of flooding (Flood Zone 1), and that other land uses (namely a bridge crossing the floodplain) can be placed in those areas of least risk pertinent to their Flood Risk Vulnerability Classification, the Sequential Test is passed. The Council also states that "there are no reasonable alternatives which can provide development of

this scale, located in close proximity to the city centre and provide wider benefits beyond those proposed for allocation in the Local Plan". We agree with this and note that in the IIA and the two-stage SFRA process, all necessary information is set out in relation to suitability, appropriateness and flood risk factors. To check the Council's work, we have carried out our own comparative assessment, and arrived at the same conclusion. We append that to these Written Representations (Appendix 2). In addition to the Sequential Test, the PPG Diagram 3 and Table 2: Flood Risk Vulnerability and Flood Zone 'Incompatibility' (PPG 7-033-20220825 and PPG 7-079-20220825 respectively, dated 25 08 2022) requires the Exception Test to be applied to any Essential Infrastructure development located within Flood Zone 3b. We agree that the Exception Test is applicable to Site 16a, given the proposed bridge and access road partly located within Flood Zone 3, and we support the Council's conclusion that the site passes its two strands. The first is to demonstrate that wider sustainability benefits are shown to outweigh any flood risk, for which the site's benefits described in the Sustainability Appraisal outweigh the flood risk associated with the access road and bridge, which is shown to be capable of mitigating flood risks in the submitted Flood Risk Strategy. The second part of the test is also met, with reference to the Level 2 SFRA undertaken by the Council, and supported by the submitted Flood Risk Strategy, in which detailed hydraulic modelling has been undertaken of the site design principles and bridge proposal. While the modelling would be further developed with more detailed design, current proposals are shown to be capable of meeting the Exception Test, that the proposed development would remain safe for its lifetime without increasing flood risk elsewhere. The Sequential and Exception Test is therefore considered to be met in relation to the Pre-Submission Local Plan, and the policy considered sound and consistent with the NPPF. The full text of our Written Representations is provided as an attached PDF. The supporting documents referred to are attached to our main response under Site Policy 16a or to this representation where expressly relevant.

Please set out the changes you consider necessary to make the Local Plan 'sound' including revised wording of any policy or text.
None.

Q4 If your representation is seeking a change, do you consider it necessary to take part and speak at the Examination?
Yes

Q4a If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:
Should there be matters relating to Policy 16a to which we have not sought specific modifications but are the subjection of others' objections (on any of the policies), we would request attendance to address the Inspector directly to express support for the allocation and address any technical points.

Attachments

Flood Risk Strategy.pdf (1)
Written Representations - Wates and Hammonds Estates.pdf

Stakeholder: Wates Developments and Hammonds Estates LLP (872955)
Comment ID: PS25-310
Consultation Point: Policy S6

Representation

Q3 Do you consider the Local Plan 'sound'?
Yes

Please provide an explanation below and identify the main issues.
These representations support Draft Policy S6 Part A in determining the housing requirement for the Local Plan Review as being consistent with national policy and justified. The identified housing requirement of 22,990 new homes in the period to 2041 equates to meeting a proportion of the Standard Method published by government in December 2024 which, in accordance with Paragraph 234 part A of the NPPF transition arrangements, forms an appropriate basis for determining Chelmsford's housing requirement for this Local Plan Review. The transition arrangements enable those authorities meeting at least 80% of the up to date Local Housing Need figure (the Standard Method calculation) and which have reached Regulation 19 stage by 12 March 2025 to progress to examination under the previous NPPF (ie December 2023). The 22,990 net new homes comprises 19 years of 1,210 net new homes per year, which equates to 83% of the 2024 Standard Method figure of 1,454 per year. This approach is therefore considered sound and is fully supported. In utilising the NPPF transition arrangements, there is no requirement for the Council to meet in full the new 2024 Standard Method figure of 1,454 new homes per year through this Local Plan Review; only to do so in its next round of plan-making. It is also appropriate for the Council to elect to plan for higher growth than the 2023 Standard Method figure of 955 homes per annum, given that the NPPF 2023 Paragraph 61 and PPG (Paragraph 2a-040-20241212) define the housing requirement as the "minimum number of homes a plan needs to provide", which may exceed local housing need if appropriate. The Council's decision to proceed with the transition arrangements is strongly supported as being consistent with the NPPF's objective of preparing and maintaining up-to-date plans in order to make consistent provision for housing and other needs; the Government's clear signals around the importance of plan-led growth and seeking universal Local Plan coverage; and the requirements set out in Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012) and NPPF Paragraph 33 to review plans every five years. The Council's Strategic Housing Needs Assessment calculates local housing need, and has been updated in stages as recently as November 2024. It has assessed the appropriateness of using the Standard Method figure as the basis for the Local Plan Review housing requirement, and on the basis of up to date demographic evidence. In doing so it evidences the housing requirement and is consistent with the NPPF. This level of planned housing delivery can assist in affordable housing delivery to help tackle council waiting lists and contribute to tackling rising homelessness and address the Housing Crisis declared by the Council in February 2022. These representations note that it is fully appropriate for the Council to proceed using the transition arrangements, as to not do so would involve considerable delay, during which time the adopted Local Plan would become more than five years old and risk the authority's ability to defend unplanned development. It is noted that the Council consulted on a Preferred Option Local Plan in the summer of 2024 which was based on a housing requirement of 1,000 homes per annum, but contained site allocations that accommodated nearly 20% more. This utilised a healthy supply buffer in order to assist the Council in maintaining a healthy delivery trajectory. The ability of the Council to translate its Preferred Option strategy into its Pre-Submission strategy, during which time the December 2024 NPPF and uplifted Standard Method came into force, was possible within the necessary timeframes due to the reallocation of this supply buffer to achieve a revised Housing Requirement that meets the NPPF transition arrangements. This is considered pragmatic and entirely appropriate, as the Council had already prepared and consulted on an evidence base to support a spatial strategy of this quantum, and has updated it housing evidence to support a revised housing requirement. Assuming the

Chelmsford Local Plan Review is adopted in 2026, provision will be made for 15 years of housing, as required by NPPF Paragraph 22, whilst delivery is backdated to a plan start date of 2022 to total 19 years. The IIA Sustainability Appraisal has also tested the sustainability implications of delivering 1,210 new homes per year through the Local Plan Review compared to alternative approaches of 1,454 homes per year (the full Standard Method number) as well as a lower housing target. It concludes that the proposed housing requirement is an appropriate basis for plan-making in sustainability terms which we support. The NPPF presumption in favour of sustainable development requires strategic policies to “as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas…” (NPPF 2023, Paragraph 11b). Together with NPPF Paragraph 35c, whereby policies “must be based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred”, and the legal requirement to discharge the Duty to Cooperate, we observe that due consideration has been given to any unmet needs of neighbouring authorities as reported in the Council’s Duty to Cooperate statement, in which the authority explains that it has engaged actively with its neighbours. In conclusion, the selection of the Local Plan Review housing target is considered sound, and consistent with national policy requirements. Consideration of uplifts to the housing number As described in Paragraph 8.1.7 above, the Council’s decision to proceed with a revised housing requirement figure and reallocate a previously identified housing buffer to meet it in full is considered sound. There is no national requirement for a buffer to be allocated in the supply trajectory, but if during the Examination process the Council or Inspector should consider that the identification of a supply buffer and/or a higher housing target would be beneficial to ensure flexibility in delivery, it would be necessary to seek more sites via major modifications. There is land available within the allocation boundary of Strategic Growth Site 16a East Chelmsford Garden Community (Hammonds Farm), to the east of Sandon Brook, that is currently identified for recreation and biodiversity uses but could, without detriment to the delivery of the allocation, contribute more to housing delivery than currently envisaged. Should a further site search be considered during this Local Plan Review, the promoters welcome the opportunity to offer further assessment and evidence of this land’s capacity for additional housing delivery (circa 700 homes) to support any modifications the Council wishes to bring forward. The full text of our Written Representations is provided as an attached PDF. The supporting documents referred to are attached to our main response under Site Policy 16a or to this representation where expressly relevant.

Please set out the changes you consider necessary to make the Local Plan ‘sound’ including revised wording of any policy or text.
None, although the comments on consideration of further modifications relating to housing supply are noted above.

Q4 If your representation is seeking a change, do you consider it necessary to take part and speak at the Examination?
Yes

Q4a If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:
Although objections are not raised, we would welcome the opportunity to attend the examination hearings on the topics discussed above if challenged by others.

Attachments

Written Representations - Wates and Hammonds Estates.pdf (1)

Stakeholder: Wates Developments and Hammonds Estates LLP (872955)
Comment ID: PS25-313
Consultation Point: Policy S7

Representation

Q3 Do you consider the Local Plan 'sound'?
Yes

Please provide an explanation below and identify the main issues.
a) We support the broad aims of Policy S7 and consider that is sets out an appropriate spatial strategy that will contribute to the achievement of sustainable development and meets identified needs. The selection of the Spatial Strategy set out in Policy S7 is underpinned by the Council's Sustainability Appraisal (SA) (part of the Integrated Impact Assessment (IAA)), which as directed by Section 19(5) of the Planning and Compulsory Purchase Act 2004, has guided the selection and development of policies and proposals in terms of their potential social, environmental and economic effects. This SA makes reference to the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 ((commonly referred to as the 'Strategic Environmental Assessment Regulations') and there is no reason to assume these are not fully met. The preparation of the Local Plan Review and the Spatial Strategy thus fulfils the NPPF Paragraph 32 requirements relating to sustainability appraisal, as well as the soundness test that requires a plan to demonstrate that it is an appropriate strategy, when considered against reasonable alternatives, to be considered justified. Our analysis of the Council's steps below in preparing the Spatial Strategy and assessing the effects of its policies, suggests that the Local Plan Review meets the NPPF tests of soundness: Consultation on a Scoping process for the SA has been carried out, and it provides responses to representations made at each stage. The Issues & Options stage SA assessed the five spatial approaches against the sustainability objectives, referring to the use of the Council's evidence base. The Preferred Option stage SA tested the environmental effects of the selected Spatial Strategy, comparing these to effects from the alternatives tested at Issues and Options stage, and set out reasons for the selection of the Spatial Strategy. This indicated that the Preferred Option was an evolved hybrid of the I&O options based on further evidence work prepared. The Pre-Submission stage SA set out analysis of further variations to the Spatial Strategy, both in spatial terms by examining alternative locations for a large strategic scale development, as well as quantitative variations in the level of housing provision. We note the increase in the committed development position at North-East Chelmsford from 3,000 homes allocated in the adopted Local Plan, to 6,250 homes in the Local Plan Review due to the full quantum spanning plan periods receiving approval at masterplan stage and included in outline planning application proposals. This growth represents a significant expansion of North East Chelmsford during this plan period, and a change in the baseline since the Issues and Options consultation, so we read the progression of the options on this basis. The sites allocated in the Plan have been selected on the basis of appropriate evidence, noting the NPPF requirement for plan-making evidence to be "adequate and proportionate, focused tightly on supporting and justifying the policies concerned" (Paragraph 31). The site allocations are consistent with the Spatial Strategy, which we believe represents a logical approach to sustainable development by continuing the adopted Spatial Strategy. Our review of the successive stages of plan-making, including the preparation of an extensive evidence base and Integrated Impact Assessment that underpin it, suggest that the Spatial Strategy meets the NPPF tests of soundness and has had full regard to the legal requirements for plan-making. Inclusion of Hammonds Farm The inclusion of East Chelmsford Garden Community (Hammonds Farm) as part of the Spatial Strategy continues the planned eastward expansion of Chelmsford in a way that benefits from proximity to existing and new strategic infrastructure, namely Beaulieu Park rail station, the A12, and new employment zones at Locations 3 (East of Chelmsford), 6 (North-East Chelmsford) and 16 (East Chelmsford, sites 16a and 16b), whilst capturing the ability to co-locate homes, jobs, schools, community facilities and green infrastructure onsite whilst and avoiding coalescence with any

surrounding smaller settlements. Alternatives have been tested through the IIA and considered less attractive in planning and sustainability terms, primarily due to their limited effectiveness in securing the same level of sustainable connections and proximity to the city centre as Hammonds Farm, which therefore creates the best opportunities available to encourage sustainable lifestyles and secure favourable planning outcomes. We support the conclusion of the IIA and evidence base that the allocation of land at East Chelmsford Garden Community utilises a location with good potential for sustainable accessibility, and particularly that the impact assessment work indicates that improving sustainable mode accessibility is important to reduce traffic impacts. The submitted Transport and Connectivity Strategy demonstrates how the site's inclusion in the spatial strategy accords with NPPF Paragraph 109, that "significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes." Further comments on its merits as a sustainable site and its comparison to reasonable alternatives are raised elsewhere in these representations, in response to the Council's IIA. During the preparation of the adopted Chelmsford Local Plan (2020), the Hammonds Farm site was tested as a reasonable alternative to the Preferred Option and was judged to be close in merit to the allocated North-East Chelmsford in terms of planning deliverability and acceptability. The Inspector's Report noted that the Preferred Strategy performed "similar to, or better than, the reasonable alternatives considered". Since the last promotion stage, two key changes have taken place: Chelmsford's housing requirement has moved on, requiring a further five years of housing need to be planned for, using an increased Standard Method calculation; and The Hammonds Farm site has gained the benefit of a direct access connection to Junction 19 and the new Beaulieu Park station, bringing two key sites accesses into play and with it the vision for a network of connecting routes from Hammonds Farm to key destinations across Chelmsford. These changes support the logical progression from the adopted Local Plan to the allocation of the Hammonds Farm site within the Local Plan Review. Chelmsford has a proven record of securing large scale growth and infrastructure delivery, as evidenced by the success of North East Chelmsford and its contribution to securing the delivery of the new Beaulieu Park rail station. The decision to extend such a Spatial Strategy and continue to leverage the benefits of large scale growth, in proximity to existing place investment, is therefore an entirely appropriate strategy. East Chelmsford Garden Community is in a sustainable location, contributes significantly to Chelmsford's development and infrastructure needs through a sustainable approach to growth, and makes a contribution to sustainable behaviours with co-location of housing, jobs and community facilities. The proposal is deliverable and in single ownership and is promoted by visionary landowners with a commitment to delivering a lasting legacy and innovation, matched by its developer partner Wates Developments, which shares with the landowners a sense of purpose in reimagining places where people can thrive. The purpose of the documentation submitted in response to Site 16a is to provide detail on the proposed development at East Chelmsford Garden Community (Hammonds Farm) and demonstrate that it is deliverable and that there are no fundamental barriers (or "show-stoppers") to bringing the site forward. Our evidence demonstrates that the site can contribute 3,000 of the Local Plan Review's total allocations of 16,100 homes, followed by a further 1,500 homes after 2041. This is evidenced by the phasing section of the submitted ECGC Infrastructure Delivery Plan, which shows that 3,000 homes can be delivered by 2041, and as detailed in the next section. b) Gypsy, Traveller and Travelling Showpeople allocations Draft Policy S7 and the Table labelled Development Locations and Allocations set out the Local Plan provision for gypsy and traveller needs. The authority has presented its evidenced need via a Gypsy and Traveller and Travelling Showpeople Accommodation Assessment and explains in Paragraph 6.53 that "the Council will expect to see Gypsy and Traveller and Travelling Showpeople accommodation provided on large strategic development allocations." Whilst we support this principle, the site distribution proposed in the Pre-Submission Local Plan is not a reasonable or justified approach, ie unsound, as there is an unfair and unbalanced distribution of these sites among the respective garden communities, summarised as follows: Strategic Growth Site 6 North-East Chelmsford – 5,549 homes (6,250 overall) and 10 Traveller pitches Strategic Growth Site 16a East Chelmsford Garden Community – 3,000 homes (4,500 overall), 20 Traveller pitches and 13 Travelling Showpeople plots. The relative scale of the two Garden Community sites does not justify the current distribution of Gypsy, Traveller and Travelling Showpeople provision, nor is the proposed provision justified by any evidence of the testing of proposed and alternative

locations. Indeed, the proposed provision has been adjusted since the Regulation 18 Preferred Option consultation stage, where a more equal distribution was suggested: Strategic Growth Site 6 North-East Chelmsford – 10 Traveller Pitches and 10 Travelling Showpeople pitches Strategic Growth Site 16a East Chelmsford Garden Community – 20 Traveller pitches. Hammonds Estates and Wates Developments supported the Preferred Option distribution above, on the basis of assisting the Council in meeting its range of housing needs. Whilst acknowledging that every strategic site must contribute to authority's infrastructure and policy needs, allocations must be proportionate so as not to burden any site with policy requirements that challenge its deliverability, as is the case here. The North East Chelmsford site has sufficient land and access characteristics to accommodate the Travelling Showpeople provision outlined at Preferred Option stage, and there is no justification given for why this need cannot be accommodated in its mix of uses. The full text of our Written Representations is provided as an attached PDF. The supporting documents referred to are attached to our main response under Site Policy 16a or to this representation where expressly relevant. Where figures are referred to above please refer to the Written Representations PDF.

Please set out the changes you consider necessary to make the Local Plan 'sound' including revised wording of any policy or text.
b) To rectify this aspect of the Spatial Strategy, we consider that a modification is required to reinstate the allocations proposed at Regulation 18 Preferred Option stage, as follows. Policy S7 Spatial Strategy Development Locations and Allocations table: Removal of 13 Travelling Showpeople pitches from Site 16a East Chelmsford Garden Community, and addition of 13 Travelling Showpeople pitches to Site 6 North East Chelmsford (Chelmsford Garden Community. Consequent modifications to Strategic Growth Site policies 6 and 16a as detailed elsewhere in these representations. Reason: to make the plan sound in terms of being justified (an appropriate strategy, taking into account reasonable alternatives) and effective (deliverable).

Q4 If your representation is seeking a change, do you consider it necessary to take part and speak at the Examination?
Yes

Q4a If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:
We wish to attend the examination hearings to discuss the proposed modifications raised above, and/or any matters relating to Policy 16a to which we have not sought specific modifications but may be the subjection of others' objections. As such, we request attendance to address the Inspector directly to express support for the allocation and address any technical points.

Attachments

Written Representations - Wates and Hammonds Estates.pdf (2)

Stakeholder: Wates Developments and Hammonds Estates LLP (872955)
Comment ID: PS25-317
Consultation Point: Policy S7, Para 6.50

Representation

Q3 Do you consider the Local Plan 'sound'?
Yes

If no, this is because you consider the Local Plan is NOT:
Positively Prepared; Justified; Effective; Consistent with national policy;

Please provide an explanation below and identify the main issues.
We support the Council's proposed Development Trajectory, as set out in Appendix C and referenced in Paragraph 6.50, including the growth assumptions for Site 16a East Chelmsford Garden Community (Hammonds Farm). The Local Plan Review suitably addresses the NPPF Paragraph 69 requirement to identify a housing supply of specific, deliverable (for five years) and developable (for years 6-10 and where possible for years 11-15) of the plan period, with Supporting Paragraph 6.50 stating that "it is anticipated that existing commitments will provide the majority of supply in the first five years alongside smaller windfall sites", and East Chelmsford Garden Community beginning to contribute delivery from year 6 onwards. In terms of its first five years, the Council has maintained strong results against the housing delivery test and a five year housing land supply, due to its proactive plan-making approach, so there is clear evidence that healthy delivery will be sustained as the existing strategic growth sites at West Chelmsford, South Woodham Ferrers, Broomfield, North East Chelmsford and East of Chelmsford come forward. Should the additional parcel at Land Adjacent to Sandford Mill Lane be added as a development parcel, as proposed in Paragraph 4.14 of these representations to the Policies Map, the allocation could begin residential delivery earlier and within the first five years of the plan. The scheduling of East Chelmsford Garden Community to commence delivery from year 6 of the plan onwards is supported by the evidence in the submitted Infrastructure Delivery Plan. The Local Plan Review Development Trajectory indicates that Site 16a East Chelmsford Garden Community (Hammonds Farm) will begin delivery from 2030 as follows: We support these numbers, which are corroborated by evidence of our approach to implementation, described below and in the submitted Infrastructure Delivery Plan. Our IDP demonstrates how the infrastructure and 3,000 homes could be delivered within the plan period, with 1,500 further homes beyond 2041, and also identifies ways in which delivery can go further if required. An outline programme is included, demonstrating how the lead-in and implementation can achieve completion of the first homes onsite by 2030, and thereafter how site phasing and buildout trajectory delivers 3,000 homes by 2041. This involves progressing through successive stages as follows: Lead-in times / Planning stages Local Plan Examination and adoption – Adoption is assumed to occur by 2026, and in parallel the East Chelmsford Garden Community team will be developing masterplan studies and proposals to enable a prompt submission of the developer-led masterplan. Masterplan preparation and approval – A well-established process in Chelmsford determines how strategic sites are required to first present a developer-produced masterplan, which is consulted on publicly for 6 weeks and then subject to Policy Board and Cabinet approval. This is not a formal Supplementary Planning Document, and published guidance on the required process has been made available by the authority, so the requirements are clear. Preparation of the masterplan and its supporting studies is subject to pre-the application engagement under the terms of a masterplan Planning Performance Agreement, which the East Chelmsford Garden Community promoters are looking to enter into with the Council in 2025, so that the masterplan preparation can be well advanced and ready for submission as early as possible. This is programmed immediately after reviewed Local Plan adoption in 2026 but could be earlier. Analysis of the adopted Local Plan 2020 strategic allocations in the figure below reveals determination periods by the Council of such masterplans of 4 to 9 months, with the North East Chelmsford Garden Community masterplan (Site

6) approved in 9 months. It is noted that this masterplan was late to be submitted, 2 years after the Local Plan adoption date, which may be due to the nature of the Consortium needing the masterplan definition to address the complexity of needing to guide three separate planning applications by its respective promoters. As a single landowner with a single masterplan developer for East Chelmsford Garden Community, Wates Developments see the ability to improve significantly on this performance and prepare and approve a masterplan to achieve submission directly after Local Plan adoption. Planning application stages – Under the adopted Local Plan 2020 the developers for each strategic growth site had to adopt a masterplan before they submitted a planning application. Recognising that there is an opportunity to overlap the processes, the Pre-Submission Local Plan Review allows for applications to be submitted before masterplans are approved. If needed, this could assist in expediting the process without undermining the necessary controls sought by the Council. Suitable allowances for the planning stages (EIA scoping, preparation and determination of the outline planning application, S106 negotiation, condition discharges and reserved matters applications for infrastructure and housing) have been made. Build Out and implementation Based on our master developer outline programme, coupled with the housing trajectory proposed in our submitted IDP, we believe that East Chelmsford Garden Community (Hammonds Farm) can meet and/or improve on the delivery of new homes within the adopted Local Plan period to 2041. This is due to a number of factors, including; We have established a robust understanding of the infrastructure requirements, associated timing and sequencing in support of early housing delivery. Assumed build out rates of around 250 to 300 homes per annum of traditional market and affordable homes, increasing up to 400 per annum incorporating the wide range of market and affordable products to rent and buy as detailed in the points below. In support of this, local comparators operating in broadly the same housing market area have been considered. North East Chelmsford Garden Community predicts annual build rates between 200 and 400 dpa over the next five years, and Council published data on North East Chelmsford Garden Community housing completions states a range of recorded housing delivery since 2016/17 of between 211 and 425 homes per annum (with the highest delivery recorded in 2023/24). This housing delivery is principally from Beaulieu and Channels developments respectively. If, for good practice, we eliminate the highest and lowest numbers, the average over the remaining years demonstrates an average housing delivery of >290 new homes per annum, which supports the housing trajectory proposed in the East Chelmsford Garden Community IDP. Recent market trends and innovative tenure options will enhance the Council's housing trajectory and further strengthen the delivery of a sustainable and balanced community. In addition to more traditional delivery of market housing and affordable housing, we believe that the increased availability and demand for Build to Rent (BTR), later living accommodation, and key worker housing (amongst other tenures) will contribute significantly to achieving and potentially exceeding the housing targets set out in the adopted Local Plan. Build to Rent (BTR) as a Catalyst for Sustainable Growth - The BTR sector continues to play an increasing role in delivering much-needed housing, particularly in locations where traditional private sale housing is constrained by affordability and market volatility. BTR developments provide high-quality, professionally managed rental accommodation, ensuring a steady supply of homes, accelerating delivery rates, and supporting long-term place-making. This tenure also provides flexibility for residents (particularly in the early stages of new masterplans where occupants often wish to try out the location before committing to buy), meets the needs of a growing demographic of renters, and contributes positively to housing supply without reliance on owner-occupation. Later Living and Retirement Housing to Address an Ageing Population - The UK's ageing population necessitates a stronger policy focus on later living accommodation, including independent living, extra care housing, multi-generational housing typologies and retirement villages. These developments not only provide desirable housing for older people but also release larger family homes back into the market, optimising housing supply across age groups and relieving pressure on local care and health finances through improved health in ageing. We support the Council's policy making in this regard. Key Worker Housing to Support Economic Growth and Essential Services - Affordable housing options targeted at key workers, such as NHS staff, teachers, emergency service personnel, and public sector employees, are critical to retaining and attracting essential workers within the area. With the increasing affordability pressures faced by these groups, dedicated key worker housing developments provide a viable solution to housing need while ensuring the sustainability of local

services and employment hubs. Place-Making and the Creation of Sustainable Communities - Each of these additional and complementary tenure options contributes significantly to the creation of sustainable and resilient communities. A mix of tenure types supports social cohesion, enhances economic stability, and ensures housing supply aligns with local demand. These are all aligned with our vision for a community that fosters family and community success. Diversified funding and delivery – The Master Developer model is inherently suited to supporting multiple concurrent delivery outlets within the site, with a wide range of developers delivering homes in parallel. This approach, combined with the different housing tenures outlined above will allow a wider range of partners to fund and deliver development. For example, Build to Rent or Keyworker homes are typically funded by long-term institutional funders such as pension funds. Later Living can be delivered by specialists in the sector, whilst smaller serviced plots have a scale, sale terms and risk profile which enables SME developers to participate. All of this will combine with traditional volume housebuilders to achieve accelerated delivery, by typically supporting six or more outlets across the site at any one time. Incorporating an additional development parcel at Land Adjacent to Sandford Mill Lane into the proposed allocation for Site 16a, as referenced in our representations on the Policies Map, helps to accelerate first housing starts and can be delivered with minimal infrastructure requirements, so that the allocation could commence delivery within the first five years of the plan (this opportunity is estimated at around 70-120 dwellings). The Lichfields Start to Finish Report (Third Edition dated March 2024) provides further evidence on the timeframe for delivery of new homes. For developments of >2,000 new dwellings, the overall lead-in time taken from lodging a planning application to the first dwelling completion is on average 6.7 years. Acknowledging the well-established process in Chelmsford that strategic sites such as East Chelmsford Garden Community are required to first present a developer-produced masterplan we are aligned with the overall timeline from submission of the Masterplan DFD to the first dwelling completion, albeit delivering more quickly than the average, based on our plan for early engagement with development partners to deliver the housing and with planning stakeholders to optimise planning timescales, enabling the average timeframe within the Lichfields Start to Finish report to be improved. Whilst we acknowledge that our understanding of the delivery and sequencing of the enabling infrastructure and housing delivery will be the subject of further development during the planning process, we have established a robust plan to inform a proposed housing trajectory and set of phasing plans that illustrate one way in which the scheme could come forward. An extract of our Infrastructure Delivery Plan delivery schedule below demonstrates that the site can deliver over 3,000 dwellings by 2041: The IDP demonstrates that the East Chelmsford Garden Community (Hammonds Farm) site is deliverable and can contribute to the Local Plan Review Development Trajectory as anticipated. The trajectory is therefore sound. We noted that objectors to Site 16a East Chelmsford Garden Community (Hammonds Farm) have criticised the adopted Local Plan for placing undue reliance on large scale garden community developments. This is not the case; out of a total housing supply of 18,473 homes including windfalls, the garden community allocations at East Chelmsford Garden Community of 3,000 homes (16%) and North-East Chelmsford (30%) contribute less than half of Chelmsford’s housing supply, supported by a wide range of sites at other scales. North-East Chelmsford is well advanced and represents the extended delivery of earlier allocations, whilst as evidenced above there is ample time during the plan period for East Chelmsford Garden Community to commence delivery, deliver infrastructure and meet the planned trajectory requirements. Furthermore, acting as single master developer and following the principles set out above, Wates Developments is motivated to bring the site forward at appropriate speed in order to support the Council in meeting its needs and to realise its investment. The full text of our Written Representations is provided as an attached PDF. Please refer to the PDF for the figures referred to. The supporting documents referred to are attached to our main response under Site Policy 16a or to this representation where expressly relevant.

Please set out the changes you consider necessary to make the Local Plan ‘sound’ including revised wording of any policy or text.
None.

Q4 If your representation is seeking a change, do you consider it necessary to take part and speak at the Examination?

Yes

Q4a If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:
Should there be matters relating to Policy 16a to which we have not sought specific modifications but are the subjection of others' objections (on any of the policies), we would request attendance to address the Inspector directly to express support for the allocation and address any technical points.

Attachments

Infrastructure Delivery Plan.pdf (1)
Written Representations - Wates and Hammonds Estates.pdf

Stakeholder: Wates Developments and Hammonds Estates LLP (872955)
Comment ID: PS25-319
Consultation Point: Policy S7, Para 6.24

Representation

Q3 Do you consider the Local Plan 'sound'?
Yes

Please provide an explanation below and identify the main issues.
Paragraph 6.24 sets out the need to balance sustainable development against a number of different issues including the loss of agricultural land. To assist the Council's consideration of the loss of best and most versatile agricultural land as required by the NPPF, Wates has undertaken agricultural land classification surveys for EGCG (Hammonds Farm), which show a large proportion of Sub Grade 3b land. Whilst this demonstrates the inevitable loss of Best and Most Versatile Land (BMV), a comparative appraisal of alternative sites considered across the district proves that no better alternative exists, as most of the site locations comprise Grade 2 and Grade 3a land. The submitted Agricultural Land Classification survey and comparative appraisal demonstrate that for the Council to meet its development needs, the loss of BMV agricultural land is unavoidable, and that alternative sites to Hammonds Farm would have similar impacts. In this regard, the Spatial Strategy is sound, justified by evidence and consistent with Paragraph 180 footnote 62 of the NPPF. The full text of our Written Representations is provided as an attached PDF.

Q4 If your representation is seeking a change, do you consider it necessary to take part and speak at the Examination?
Yes

Q4a If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:
If there are any matters relating to Policy 16a to which we have not sought specific modifications but may be the subjection of others' objections. As such, we request attendance to address the Inspector directly to express support for the allocation and address any technical points.

Attachments

Written Representations - Wates and Hammonds Estates.pdf (3)
Agricultural Land Classification Survey.pdf (1)

Stakeholder: Wates Developments and Hammonds Estates LLP (872955)
Comment ID: PS25-321
Consultation Point: Policy S9

Representation

Q3 Do you consider the Local Plan 'sound'?
Yes

Please provide an explanation below and identify the main issues.
We support the policy and its key approach that development must be supported by the provision of infrastructure, services and facilities that are “identified as necessary to serve its needs”. We consider that in respect of Site 16a East Chelmsford Garden Community (Hammonds Farm), Strategic Policy S10 is consistent with the infrastructure requirements outlined in the Site 16a allocation policy. In support of these representations, and to provide information on the infrastructure delivery for Site 16a, we have prepared an initial East Chelmsford Garden Community (Hammond Farm) Infrastructure Delivery Plan (East Chelmsford Garden Community IDP) which sets out our understanding, at this stage, of the infrastructure that would support the site in coming forward in accordance with policies and to meet the development’s needs. The East Chelmsford Garden Community IDP contains an infrastructure schedule that identifies what items of infrastructure are expected to be needed to support East Chelmsford Garden Community, how these might be secured, and includes a set of indicative sequencing plans that illustrate one way in which the housing, employment and associated infrastructure could be phased. This demonstrates how the site can come forward as envisaged by the Pre-Submission Local Plan, and within its timeframes. This evidence provides a good level of confidence that the site’s infrastructure needs have been appropriately investigated, in proportion to this stage of the plan preparation, and that the site can come forward as envisaged by the Local Plan Review. We have undertaken a review of the Chelmsford Local Plan Infrastructure Delivery Plan prepared by Arup for the Council. This IDP was commissioned in August 2023 and draft two was published in January 2025. Firstly, we agree with the Council’s approach to IDP preparation described in Paragraph 6.111 of the supporting text to S10: “The IDP is a ‘living’ document, where assessments of costs, funding, delivery, indexation and phasing will continue to be updated, in conjunction with further work being undertaken with site promotors, ECC and funding partners.” This is considered appropriate given the nature of the two Garden Community sites included in the Pre-Submission Local Plan Review that plan for long term scenarios and straddle plan periods, and reflects NPPF Footnote 39’s acknowledgement that “associated infrastructure requirements may not be capable of being identified fully at the outset” and should be kept under review. We welcome the opportunity to work collaboratively with the Council on its ongoing review of the IDP, in step with the master planning process, preparation of the Masterplan DFD and the subsequent planning applications, so that infrastructure requirements are appropriately identified and tested as detailed work is carried out. Appendix C of the submitted East Chelmsford Garden Community IDP provides a response to the Council IDP’s Table B.18 Delivery Schedule for Site 16a East Chelmsford Garden Community (Hammonds Farm). It outlines key differences in approach between the respective IDPs prepared at this stage by the Council and the East Chelmsford Garden Community promoters. Whilst in the main the IDPs are aligned in their approach to the development of East Chelmsford Garden Community, the ECGC IDP suggests potential for a greater level of onsite direct delivery in support of the development than is currently identified within the council IDP and consideration should be given to adjusting these items. As detailed in our representations to Policy S10, Site 16a East Chelmsford Garden Community (Hammonds Farm) is a large scale site where onsite infrastructure provision will be a key aspect of the proposals and will assist in delivering the project vision. As such, we would anticipate that necessary infrastructure, which is directly related to the development, may be delivered directly by the developer where it is fair and reasonable to do so; otherwise proportionate planning contributions will be utilised. We refer to our separate representations on Draft Policy S10 in relation to delivery

mechanisms. The full text of our Written Representations is provided as an attached PDF.

Please set out the changes you consider necessary to make the Local Plan 'sound' including revised wording of any policy or text.
None specifically to make the plan sound, but we request that comments raised on the Council's draft IDP are considered in subsequent updates to that live document.

Q4 If your representation is seeking a change, do you consider it necessary to take part and speak at the Examination?
Yes

Q4a If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:
We have not raised specific modifications, but as a general point, should there be matters relating to Policy 16a to which we have not sought specific modifications but are the subjection of others' objections (on any of the policies) or where the Inspector would like to hear directly from us, we would request attendance to address the Inspector directly to express support for the allocation and address any technical points.

Attachments

Written Representations - Wates and Hammonds Estates.pdf (4)
Infrastructure Delivery Plan.pdf (2)

Stakeholder: Wates Developments and Hammonds Estates LLP (872955)
Comment ID: PS25-322
Consultation Point: Policy S9, Para 6.91

Representation

Q3 Do you consider the Local Plan 'sound'?
Yes

Please provide an explanation below and identify the main issues.
Supporting Paragraph 6.91 refers to the Council's Local Plan Review traffic modelling evidence base. As part of our Representations, a submitted Traffic Modelling Overview appraises the appropriateness of the evidence base as justification for the Local Plan Review, and assesses what infrastructure requirements are needed, as modelled at this stage, to support the highway network to enable decision-makers to form an appropriate view of the NPPF Paragraph 115 tests regarding severity. The detailed analysis in this Overview is described more fully in our representations to draft Strategy Growth Site 16a East Chelmsford Garden Community (Hammonds Farm). In line with these representations on Site 16a, we consider that Policy S9 Infrastructure Requirements clearly establishes the infrastructure requirements required on the basis of evidence at this stage, and the findings of the Traffic Modelling Overview are that the Local Plan Review evidence base sets an appropriate basis for determining the likely infrastructure improvements to the local and strategic road network. We agree with the supporting text Paragraph 6.91, that "more detailed analysis of traffic impacts and mitigation options testing will be required through the preparation of Transport Assessments/Statements as part of future planning applications". At the outline planning application stage, the Transport Assessment for East Chelmsford Garden Community (Hammonds Farm) will establish the basis for the highways infrastructure required to meet the needs of the development, alongside delivery timelines in agreement with Essex Highways and National Highways. Specific works will be secured and controlled via S106 and S278 Agreement to ensure timely phasing and delivery of necessary transport infrastructure and other measures. Overall, we consider the evidence base to be robust and proportionate for the Local Plan Review, and will continue collaborative dialogue with Essex County Council and National Highways to inform the scope of sustainable mitigation to manage trips from the Local Plan Review sites, and pledge to work with ECC and NH in their plans to secure a joined up plan for the necessary infrastructure. The full text of our Written Representations is provided as an attached PDF, with supporting documents referred to where relevant.

Q4a If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:
We have not raised specific modifications, but as a general point, should there be matters relating to Policy 16a to which we have not sought specific modifications but are the subjection of others' objections (on any of the policies) or where the Inspector would like to hear directly from us, we would request attendance to address the Inspector directly to express support for the allocation and address any technical points.

Attachments

Written Representations - Wates and Hammonds Estates.pdf (5)
Traffic Modelling Overview.pdf (1)

Stakeholder: Wates Developments and Hammonds Estates LLP (872955)
Comment ID: PS25-324
Consultation Point: Policy S10

Representation

Q3 Do you consider the Local Plan 'sound'?
No

If no, this is because you consider the Local Plan is NOT:
Effective; Consistent with national policy;

Please provide an explanation below and identify the main issues.
We broadly support Policy S10. It is considered to be in line with national policy, which is to establish infrastructure requirements, subject to viability. The policy requirement for infrastructure to be timely and phased is also supported and critical to the successful delivery of Site 16a East Chelmsford Garden Community (Hammonds Farm). The site infrastructure requirements for East Chelmsford Garden Community - as set out in the council's IDP - are extensive, as is reasonably expected for a Garden Community strategic site, in order that the full extent of policy expectations and effective placemaking can be achieved. We note that the CCC Infrastructure Delivery Plan Stage 2 report (November 2024) indicates 31 different categories of infrastructure for Site 16a East Chelmsford Garden Community (Hammonds Farm), with an anticipated total cost to the developer of £111.6m. The Regulation 19 Viability Note (November 2024) also confirms that substantial infrastructure and section 106 contributions will be required for the site, totalling £229.5m for the 4,500 homes, and suggests that Community Infrastructure Levy contributions should also be payable in addition to the £229.5m of infrastructure identified. The Council's draft Planning Obligations SPD (February 2025) is being consulted on alongside the Pre-Submission Local Plan. This indicates at Paragraph 3.5 that: "Due to the scale and complexity of delivering the infrastructure required for the Chelmsford Garden Community (Location 6) and East Chelmsford Garden Community (Location 16), bespoke infrastructure delivery mechanism may be appropriate and will be considered through the garden community governance structures and consulted upon separately." We agree with this, and support the Council's acknowledgement of the scale and complexity of infrastructure delivery. As such we suggest that care is needed in setting the overall level of planning obligations, requiring flexibility to be exercised. Whilst the infrastructure assessment within the Council's evidence base (Local Plan Viability Note November 2024) is helpful in assessing costs for the site, further technical work has been undertaken by the project team as the certainty around the site's planning prospects has increased. As an example, early cost estimates relating to the East Chelmsford Garden Community Multi Modal Bridge and associated Northern Link road crossing the Chelmer (described at Paragraph 6.12 of the submitted Transport and Connectivity Strategy), which are summarised at Appendix 3, give an example of our concern that based on the level of information currently available, the estimates for these two abnormal cost items are substantial and in excess of those currently in use by the Council. Payment of these costs, the wider infrastructure identified within the IDP and an expected CIL payment could, in combination, place a substantial financial burden on the scheme. We agree with supporting paragraph 6.111 that the IDP is a 'living' document, where assessments of costs, funding, delivery, indexation and phasing will continue to be updated, in conjunction with further work being undertaken with site promotors, ECC and funding partners. A definitive position on viability will need to be reached once the detail and the quality of information on scheme design matures. At that stage, both the Council and the site promoter must have confidence that the quality of the scheme would not be risked by the combination of policy requirements and obligations, as is appropriately reflected in Supporting Paragraph 6.111 to Policy S10. In such an instance, CIL - if it is indeed payable on top of other obligations - should be ringfenced to support onsite infrastructure. This approach has been used in relation to the North East Chelmsford Garden Community. The wording of Policy S10 contains sufficient flexibility in the type of obligations and

financial contributions through which infrastructure will be secured. We suggest that additional wording would bring the supporting text to Policy S10 into line with the draft Planning Obligations SPD (February 2025), as well as the Council's guidance on Community Infrastructure Levy Governance Allocating and Spending CIL (March 2024), as well as the PPG requirement that the specific circumstances of strategic sites are considered (PPG 10-005-20180724 Revision Date 24 07 2018). The full text of our Written Representations and Appendix referred to is provided as an attached PDF.

Please set out the changes you consider necessary to make the Local Plan 'sound' including revised wording of any policy or text.
We request that the following modification is added to supporting paragraph 6.107: Paragraph 6.107 add final new sentence: The Council will have regard to the inherent scale and complexity and infrastructure needs of the Garden Communities when assessing the requirements for planning obligations and CIL. Consideration will be given to ringfencing CIL or the use of other bespoke infrastructure mechanisms to help fund infrastructure required to support their delivery. Reason: to bring extra clarity to the policy and improve its soundness in terms of its effectiveness (deliverability) and consistency with national policy.

Q4 If your representation is seeking a change, do you consider it necessary to take part and speak at the Examination?
Yes

Q4a If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:
We wish to attend the examination hearings to discuss the proposed modifications raised above. As a general point, should there be matters relating to Policy 16a to which we have not sought specific modifications but are the subjection of others' objections (on any of the policies), we would request attendance to address the Inspector directly to express support for the allocation and address any technical points.

Attachments

Written Representations - Wates and Hammonds Estates.pdf (6)

Stakeholder: Wates Developments and Hammonds Estates LLP (872955)
Comment ID: PS25-327
Consultation Point: Policy DM1

Representation

Q3 Do you consider the Local Plan 'sound'?
No

If no, this is because you consider the Local Plan is NOT:
Consistent with national policy;

Please provide an explanation below and identify the main issues.
a) We support the policy as drafted, but consider that stronger support should be given to Build to Rent, on the basis that the council's position does not comply fully with national guidance on properly assessing the needs of those who want to rent, and does not reflect the demand for rented homes and the benefits of delivery of this tenure. Benefits include the ability to bring in forward funding, creating a critical mass of residents onsite as part of a phased delivery, and enabling those supporting economic growth and delivering public services to easily move to the area. Finally, the Strategic Housing Needs Assessment (SHNA) 2023 indicates strong demand for this tenure, and its benefits in increasing housing quality, its role in serving essential keyworkers and the need for a flexible unit type mix. b) We support in principle the requirement in Policy DM1 Part D(i) for large greenfield sites to deliver 10% of market housing for Older Persons, and consider that this can form part of a broad housing mix, particularly at Garden Community scale where the broadest tenure/type mix should be targeted. We consider, however, that this should be an aim rather a fixed target and subject to local housing demand assessed at the time of the planning application. The full text of our Written Representations is provided as an attached PDF.

Please set out the changes you consider necessary to make the Local Plan 'sound' including revised wording of any policy or text.
a) It is suggested that a new sentence be added to the end of Paragraph 8.6 to make the policy consistent with the NPPF, stating: Paragraph 8.6 add new final sentence: The SHNA 2023 indicates strong demand for this tenure, and its benefits in increasing housing quality, its role in serving essential keyworkers and the need for a flexible unit type mix. Where viable, its inclusion should be considered as part of a wider housing mix. Reason: to make the policy sound in terms of its consistency with national policy. b) We request that the following is added: Part D)(i) - 10% of market housing to be provided for Older Persons, "subject to an assessment of local housing demand". Reason: to make the policy sound in terms of its effectiveness and evidenced justification. See submitted PDF for full marked up changes to the policy wording.

Q4 If your representation is seeking a change, do you consider it necessary to take part and speak at the Examination?
Yes

Q4a If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:
We wish to attend the examination hearings to discuss the proposed modifications raised above.

Attachments

Written Representations - Wates and Hammonds Estates.pdf (7)

Stakeholder: Wates Developments and Hammonds Estates LLP (872955)
Comment ID: PS25-331
Consultation Point: Policy DM16

Representation

Q3 Do you consider the Local Plan 'sound'?
No

If no, this is because you consider the Local Plan is NOT:
Effective; Consistent with national policy;

Please provide an explanation below and identify the main issues.
We support in principle the policy targets within Policy DM16 for the Garden Community Developments to deliver 20% Biodiversity Net Gain, though as set out in representations to Site 16a a higher target value should not invite offsite top-up requirements. However, we challenge Paragraph 8.147 which states that: “Public open space requirements or the provision of SANGs are separate to biodiversity net gain and will not be considered as an alternative to or a replacement for net gain provisions. Where possible, the provision of both on site should be segregated to ensure the quality of the habitat for wildlife is maximised”. This proposed requirement to separate BNG and SANG/public open space land will result in the site, and other projects, being unable to deliver BNG requirements on-site, and is not consistent with national guidance. DEFRA guidance issued in February 2024 in relation to ‘stacking’ of BNG and other environmental benefits states that mitigation and compensation measures for protected sites or species (e.g. SANG) can be counted in part towards a developments BNG requirement (Guidance: What you can count towards a development’s biodiversity net gain https://www.gov.uk/guidance/what-you-can-count-towards-a-developments-biodiversity-net-gain-bng). In accordance with this guidance, “at least 10% of the developer’s biodiversity units must come from additional activities other than mitigation and compensation”. This guidance also states that green infrastructure can be counted in full towards BNG requirements. Natural England (2021) Guidelines for Creation of Suitable Alternative Natural Greenspace precede the Environment Act 2021 requirement for 10% net gain. (This note was produced for the Thames Basin Heaths SPA but became referred to as general guidance). These state that BNG can be delivered on SANG subject to the SANG achieving “nature conservation outcomes that demonstrably exceed existing obligations under the SANG guidance, as quantified through the metric”. Therefore, BNG calculations would have to demonstrate additional biodiversity unit uplift beyond the minimum SANG requirements, for example through providing higher condition or distinctiveness habitats. Both the older Natural England SANG guidance and the DEFRA BNG guidance confirm SANG can contribute in part to BNG requirements. The full text of our Written Representations is provided as an attached PDF.

Please set out the changes you consider necessary to make the Local Plan ‘sound’ including revised wording of any policy or text.
It is therefore requested that the last two sentences of Paragraph 8.147 are amended in accordance with latest government guidance as follows: Paragraph 8.147: delete “Public open space requirements or the provision of SANGs are separate to biodiversity net gain and will not be considered as an alternative to or a replacement for net gain provisions. Where possible, the provision of both on site should be segregated to ensure the quality of the habitat for wildlife is maximised” and replace with “Mitigation measures for protected sites (including SANG) can count towards BNG requirements as long as at least 10% of the biodiversity units come from additional activities other than mitigation and compensation.” Part C(iv) of DM16 should be amended so that the 20% target for the Garden Communities should be capped at what is practically deliverable onsite and that offsite top-ups will not be sought. DM16 Part C (iv): Unless exempt, must provide a minimum 10% biodiversity net gain (20% on Chelmsford Garden Community and East Chelmsford Garden Community onsite) above the existing ecological baseline value of the site Paragraph 8.145:

In line with policies SGS6 and SGS16a, a minimum of 20% biodiversity net gain will be required for Chelmsford Garden Community and East Chelmsford Garden Community, subject to site constraints and to be capped at what can be practically delivered onsite. Reason: to make the policy deliverable and consistent with national policy statements. See submitted PDF for full marked up changes to the policy wording.

Q4 If your representation is seeking a change, do you consider it necessary to take part and speak at the Examination?
Yes

Q4a If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:
We wish to attend the examination hearings to discuss the proposed modifications raised above. As a general point, should there be matters relating to Policy 16a to which we have not sought specific modifications but are the subjection of others' objections (on any of the policies), we would request attendance to address the Inspector directly to express support for the allocation and address any technical points.

Attachments

Written Representations - Wates and Hammonds Estates.pdf (8)
Green Infrastructure Strategy.pdf (3)

Stakeholder: Wates Developments and Hammonds Estates LLP (872955)
Comment ID: PS25-333
Consultation Point: Policy DM31

Representation

Q3 Do you consider the Local Plan 'sound'?
No

If no, this is because you consider the Local Plan is NOT:
Effective;

Please provide an explanation below and identify the main issues.
We support in principle the ambition of draft Policy DM 31 Net Zero Carbon in Operation as we recognise the need to exceed current proposed Government policy and building regulations performance requirements in order to meet the UK's legally binding Net Zero 2050 strategic Net Zero Carbon targets. However, we do have concerns about the viability of achieving the draft Policy DM31 standards' stringent targets at scale today, so we cannot fully support the policy wording in its current form. We have completed an appraisal of the policy requirements against appropriate guidance, standards and targets including: Approved Document Part L (2021), proposed Future Homes & Buildings Standards (2023), LETI Climate Emergency Design Guide, RIBA 2030 Climate Challenge, Passivhaus Standard, UK Net Zero Carbon Building Standard Pilot and Wates Developments' Sustainability Strategy targets. A summary of the appraisal is shown in the table provided in Appendix 4 to these Written Representations. It should be noted that the appraisal captures the current and predicted position of National Policy, Building Regulations and industry guidance but these positions are likely to evolve in the future. The appraisal demonstrates that the requirements of draft Policy DM31 represent the peak of industry best practice. Though many of the requirements align with other standards, their collective implementation exceeds the requirements of all other standards and targets. Wates Developments has made commitments in its own Sustainability Strategy to achieve Net Zero Carbon Ready Homes (aligned to draft Future Homes Standard requirements) for all homes, and to elevate that performance to Net Zero Carbon in operation for 25% of homes consented by 2030. This demonstrates Wates' ambition to exceed the minimum requirements of Government policy and regulation and represents a significant step towards the policy intent, but it does not meet each of the individual Policy DM31 requirements. Although Chelmsford has completed viability testing for the policy, we remain concerned about both the supply chain capacity and skill, as well as the cost uplift required to achieve the policy requirements in full on large scale sites that will deliver over around 15 years, from day one. The introduction of the Future Homes Standard will help to significantly push the industry forward with economies of scales helping to reduce some costs. However, this step-change to achieving the Future Homes Standard should not be underestimated. The policy requirements represent a significant technical improvement on the Future Homes Standard, which we anticipate the supply chain will struggle to deliver across a scheme of this scale. Therefore, we consider that any policy requirements that go beyond the Future Homes Standard should use a stepped, rather than blanket, approach. Adopting a responsive and flexible approach to the inevitable evolution in the industry's capacity and capability will enable the delivery of large-scale developments such as East Chelmsford Garden Community to realistically balance the need for homes to be built at pace, scale and quality with the ambition for truly net zero (operational) homes. The full text of our Written Representations is provided as an attached PDF.

Please set out the changes you consider necessary to make the Local Plan 'sound' including revised wording of any policy or text.
Please see the attached Written Representations PDF for the wording of our proposed modification. The proposed modifications to Requirements 1 and 3 are aligned to the UK Net Zero Carbon Building Standard Pilot (NZCBS) 2024 as this is the industry's current leading Net Zero Carbon

definition. This approach ensures the policy retains the intent of delivering buildings designed to be Net Zero Carbon in Operation but is considered achievable, justified by the significant evidence base that the NZCBS is based on. The amended targets and phased approach sought by the modification provide some flexibility for developments to respond to the viability challenges posed by the significant uplift in energy performance requirements beyond emerging national regulation (Future Homes and Buildings Standards). The proposed amended targets are aligned to the equivalent metrics in the NZCBS 2024 Pilot but full verification against the Standard is voluntary and should not be mandated in policy. Overall, the proposed modifications sought above would make the policy sound by virtue of introducing more appropriate flexibility to aid its implementation and therefore its effectiveness. The modifications continue to exceed national guidance as a means of addressing the climate emergency, whilst recognising the benefits of a staged approach.

Q4 If your representation is seeking a change, do you consider it necessary to take part and speak at the Examination?
Yes

Q4a If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:
We wish to attend the examination hearings to discuss the proposed modifications raised above. As a general point, should there be matters relating to Policy 16a to which we have not sought specific modifications but are the subjection of others' objections (on any of the policies), we would request attendance to address the Inspector directly to express support for the allocation and address any technical points.

Attachments

Written Representations - Wates and Hammonds Estates.pdf (9)

Stakeholder: Wates Developments and Hammonds Estates LLP (872955)
Comment ID: PS25-335
Consultation Point: Para 4.2

Representation

Q3 Do you consider the Local Plan 'sound'?
Yes

Please provide an explanation below and identify the main issues.
Hammonds Estates and Wates Developments strongly support the draft Local Plan Review, which well articulates the cross-cutting themes and policy priorities that will help to steer sustainable growth in Chelmsford. In line with our own objectives for Hammonds Farm, we respect the ambition and innovation captured in the Local Plan Review, and consider that it sets a positive basis for the delivery of growth and infrastructure in a manner that advances the social, environmental and economic prospects of Chelmsford. We consider it addresses the plan-making framework set out in Chapter 3 of the National Planning Policy Framework (NPPF), having been positively prepared, based on effective engagement and supported by proportionate evidence. We consider that the draft Local Plan Review has considerable merit, reflecting Chelmsford's track record in delivering plan-led growth that is well-designed and meets the varied needs and aspirations of its residents and employees. Hammonds Estates and Wates Developments support the proposed new Local Plan vision for "a greener, fairer and more connected community". We observe how these three pillars inter-relate, with environmental improvements and better connectivity contributing to enhanced social mobility, wellbeing and fairness. We see strong alignments with the Council's vision for Chelmsford and our vision for Hammonds Farm, which is centred around place-making that supports community success and enhanced social mobility, so we particularly support the Plan's emphasis on fairness. As acknowledged by its inclusion as a Strategic Growth Site of a significant scale, the Hammonds Farm site is capable of making a significant contribution to achieving the Local Plan Review's vision for Chelmsford. In addition to being well located and suited physically to delivering sustainable growth, it offers further opportunities arising from the project vision around making places that support social mobility, inclusivity and wellbeing. The project vision is to improve the social mobility and life chances of every individual living in the East Chelmsford Garden Community. Of primary importance in planning Hammonds Farm is the commitment to family and community success, with a particular focus on wellbeing, inclusion and safety. By widening the ladder of opportunity and removing the physical and social barriers that exist, we aim to help more people within the community to progress more easily in life and reach their full potential. This inclusive vision forms a golden thread through how the Garden Community is designed, planned and delivered, and affords significant weight to social priorities when balancing considerations. The vision for East Chelmsford Garden Community offers an opportunity for a fresh approach to placemaking, one that is primarily focused on creating a strong community where people can thrive. Achieving this relies on a holistic design approach - not just focusing on the physical aspects, but on how the built environment supports service provision and nurtures wellbeing, including through long-term stewardship arrangements. We believe that we can help to create a successful community in and around Hammonds Farm through embedding ideas under the following themes: The right ingredients for family and community success Everything on your doorstep - a connected place delivering active and sustainable travel Embracing net zero for healthier lives and planet. We therefore support the Local Plan Review's vision for a greener, fairer and more connected Chelmsford as this aligns strongly with our project vision. This indicates that the Local Plan Review Vision will be well supported by the inclusion and delivery of Site 16a East Chelmsford Garden Community (Hammonds Farm). The full text of our Written Representations is provided as an attached PDF, along with the project Vision and Concept Masterplan for East Chelmsford Garden Community.

Please set out the changes you consider necessary to make the Local Plan ‘sound’ including revised wording of any policy or text.
None.

Q4a If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:
As a general point, should there be matters relating to Policy 16a to which we have not sought specific modifications but are the subjection of others’ objections (on any of the policies), we would request attendance to address the Inspector directly to express support for the allocation and address any technical points.

Attachments

Written Representations - Wates and Hammonds Estates.pdf (10)
Vision and Concept Masterplan - 2025 Update.pdf (1)

Stakeholder: Wates Developments and Hammonds Estates LLP (872955)
Comment ID: PS25-336
Consultation Point: Policy S1

Representation

Q3 Do you consider the Local Plan 'sound'?
Yes

Please provide an explanation below and identify the main issues.
We support Strategic Policy 1 – Spatial Principles. It is evident from the Council's Integrated Impact Assessment testing that these spatial principles will shape the delivery of sustainable development. It is also judged that the Spatial Strategy and site selections have been made in accordance with these Spatial Principles, resulting in a sound plan that is prepared on robust principles. The full text of our Written Representations is provided as an attached PDF.

Attachments

Written Representations - Wates and Hammonds Estates.pdf (11)

Stakeholder: Wates Developments and Hammonds Estates LLP (872955)
Comment ID: PS25-343
Consultation Point: Appendix C

Representation

Q3 Do you consider the Local Plan 'sound'?
Yes

If no, this is because you consider the Local Plan is NOT:
Positively Prepared; Justified; Effective; Consistent with national policy;

Please provide an explanation below and identify the main issues.
We support the Council's proposed Development Trajectory, as set out in Appendix C and referenced in Paragraph 6.50, including the growth assumptions for Site 16a East Chelmsford Garden Community (Hammonds Farm). The Local Plan Review suitably addresses the NPPF Paragraph 69 requirement to identify a housing supply of specific, deliverable (for five years) and developable (for years 6-10 and where possible for years 11-15) of the plan period, with Supporting Paragraph 6.50 stating that "it is anticipated that existing commitments will provide the majority of supply in the first five years alongside smaller windfall sites", and East Chelmsford Garden Community beginning to contribute delivery from year 6 onwards. In terms of its first five years, the Council has maintained strong results against the housing delivery test and a five year housing land supply, due to its proactive plan-making approach, so there is clear evidence that healthy delivery will be sustained as the existing strategic growth sites at West Chelmsford, South Woodham Ferrers, Broomfield, North East Chelmsford and East of Chelmsford come forward. Should the additional parcel at Land Adjacent to Sandford Mill Lane be added as a development parcel, as proposed in Paragraph 4.14 of these representations to the Policies Map, the allocation could begin residential delivery earlier and within the first five years of the plan. The scheduling of East Chelmsford Garden Community to commence delivery from year 6 of the plan onwards is supported by the evidence in the submitted Infrastructure Delivery Plan. The Local Plan Review Development Trajectory indicates that Site 16a East Chelmsford Garden Community (Hammonds Farm) will begin delivery from 2030 as follows: We support these numbers, which are corroborated by evidence of our approach to implementation, described below and in the submitted Infrastructure Delivery Plan. Our IDP demonstrates how the infrastructure and 3,000 homes could be delivered within the plan period, with 1,500 further homes beyond 2041, and also identifies ways in which delivery can go further if required. An outline programme is included, demonstrating how the lead-in and implementation can achieve completion of the first homes onsite by 2030, and thereafter how site phasing and buildout trajectory delivers 3,000 homes by 2041. This involves progressing through successive stages as follows: Lead-in times / Planning stages Local Plan Examination and adoption – Adoption is assumed to occur by 2026, and in parallel the East Chelmsford Garden Community team will be developing masterplan studies and proposals to enable a prompt submission of the developer-led masterplan. Masterplan preparation and approval – A well-established process in Chelmsford determines how strategic sites are required to first present a developer-produced masterplan, which is consulted on publicly for 6 weeks and then subject to Policy Board and Cabinet approval. This is not a formal Supplementary Planning Document, and published guidance on the required process has been made available by the authority, so the requirements are clear. Preparation of the masterplan and its supporting studies is subject to pre-the application engagement under the terms of a masterplan Planning Performance Agreement, which the East Chelmsford Garden Community promoters are looking to enter into with the Council in 2025, so that the masterplan preparation can be well advanced and ready for submission as early as possible. This is programmed immediately after reviewed Local Plan adoption in 2026 but could be earlier. Analysis of the adopted Local Plan 2020 strategic allocations in the figure below reveals determination periods by the Council of such masterplans of 4 to 9 months, with the North East Chelmsford Garden Community masterplan (Site

6) approved in 9 months. It is noted that this masterplan was late to be submitted, 2 years after the Local Plan adoption date, which may be due to the nature of the Consortium needing the masterplan definition to address the complexity of needing to guide three separate planning applications by its respective promoters. As a single landowner with a single masterplan developer for East Chelmsford Garden Community, Wates Developments see the ability to improve significantly on this performance and prepare and approve a masterplan to achieve submission directly after Local Plan adoption. Planning application stages – Under the adopted Local Plan 2020 the developers for each strategic growth site had to adopt a masterplan before they submitted a planning application. Recognising that there is an opportunity to overlap the processes, the Pre-Submission Local Plan Review allows for applications to be submitted before masterplans are approved. If needed, this could assist in expediting the process without undermining the necessary controls sought by the Council. Suitable allowances for the planning stages (EIA scoping, preparation and determination of the outline planning application, S106 negotiation, condition discharges and reserved matters applications for infrastructure and housing) have been made. Build Out and implementation Based on our master developer outline programme, coupled with the housing trajectory proposed in our submitted IDP, we believe that East Chelmsford Garden Community (Hammonds Farm) can meet and/or improve on the delivery of new homes within the adopted Local Plan period to 2041. This is due to a number of factors, including; We have established a robust understanding of the infrastructure requirements, associated timing and sequencing in support of early housing delivery. Assumed build out rates of around 250 to 300 homes per annum of traditional market and affordable homes, increasing up to 400 per annum incorporating the wide range of market and affordable products to rent and buy as detailed in the points below. In support of this, local comparators operating in broadly the same housing market area have been considered. North East Chelmsford Garden Community predicts annual build rates between 200 and 400 dpa over the next five years, and Council published data on North East Chelmsford Garden Community housing completions states a range of recorded housing delivery since 2016/17 of between 211 and 425 homes per annum (with the highest delivery recorded in 2023/24). This housing delivery is principally from Beaulieu and Channels developments respectively. If, for good practice, we eliminate the highest and lowest numbers, the average over the remaining years demonstrates an average housing delivery of >290 new homes per annum, which supports the housing trajectory proposed in the East Chelmsford Garden Community IDP. Recent market trends and innovative tenure options will enhance the Council's housing trajectory and further strengthen the delivery of a sustainable and balanced community. In addition to more traditional delivery of market housing and affordable housing, we believe that the increased availability and demand for Build to Rent (BTR), later living accommodation, and key worker housing (amongst other tenures) will contribute significantly to achieving and potentially exceeding the housing targets set out in the adopted Local Plan. Build to Rent (BTR) as a Catalyst for Sustainable Growth - The BTR sector continues to play an increasing role in delivering much-needed housing, particularly in locations where traditional private sale housing is constrained by affordability and market volatility. BTR developments provide high-quality, professionally managed rental accommodation, ensuring a steady supply of homes, accelerating delivery rates, and supporting long-term place-making. This tenure also provides flexibility for residents (particularly in the early stages of new masterplans where occupants often wish to try out the location before committing to buy), meets the needs of a growing demographic of renters, and contributes positively to housing supply without reliance on owner-occupation. Later Living and Retirement Housing to Address an Ageing Population - The UK's ageing population necessitates a stronger policy focus on later living accommodation, including independent living, extra care housing, multi-generational housing typologies and retirement villages. These developments not only provide desirable housing for older people but also release larger family homes back into the market, optimising housing supply across age groups and relieving pressure on local care and health finances through improved health in ageing. We support the Council's policy making in this regard. Key Worker Housing to Support Economic Growth and Essential Services - Affordable housing options targeted at key workers, such as NHS staff, teachers, emergency service personnel, and public sector employees, are critical to retaining and attracting essential workers within the area. With the increasing affordability pressures faced by these groups, dedicated key worker housing developments provide a viable solution to housing need while ensuring the sustainability of local

services and employment hubs. Place-Making and the Creation of Sustainable Communities - Each of these additional and complementary tenure options contributes significantly to the creation of sustainable and resilient communities. A mix of tenure types supports social cohesion, enhances economic stability, and ensures housing supply aligns with local demand. These are all aligned with our vision for a community that fosters family and community success. Diversified funding and delivery – The Master Developer model is inherently suited to supporting multiple concurrent delivery outlets within the site, with a wide range of developers delivering homes in parallel. This approach, combined with the different housing tenures outlined above will allow a wider range of partners to fund and deliver development. For example, Build to Rent or Keyworker homes are typically funded by long-term institutional funders such as pension funds. Later Living can be delivered by specialists in the sector, whilst smaller serviced plots have a scale, sale terms and risk profile which enables SME developers to participate. All of this will combine with traditional volume housebuilders to achieve accelerated delivery, by typically supporting six or more outlets across the site at any one time. Incorporating an additional development parcel at Land Adjacent to Sandford Mill Lane into the proposed allocation for Site 16a, as referenced in our representations on the Policies Map, helps to accelerate first housing starts and can be delivered with minimal infrastructure requirements, so that the allocation could commence delivery within the first five years of the plan (this opportunity is estimated at around 70-120 dwellings). The Lichfields Start to Finish Report (Third Edition dated March 2024) provides further evidence on the timeframe for delivery of new homes. For developments of >2,000 new dwellings, the overall lead-in time taken from lodging a planning application to the first dwelling completion is on average 6.7 years. Acknowledging the well-established process in Chelmsford that strategic sites such as East Chelmsford Garden Community are required to first present a developer-produced masterplan we are aligned with the overall timeline from submission of the Masterplan DFD to the first dwelling completion, albeit delivering more quickly than the average, based on our plan for early engagement with development partners to deliver the housing and with planning stakeholders to optimise planning timescales, enabling the average timeframe within the Lichfields Start to Finish report to be improved. Whilst we acknowledge that our understanding of the delivery and sequencing of the enabling infrastructure and housing delivery will be the subject of further development during the planning process, we have established a robust plan to inform a proposed housing trajectory and set of phasing plans that illustrate one way in which the scheme could come forward. An extract of our Infrastructure Delivery Plan delivery schedule below demonstrates that the site can deliver over 3,000 dwellings by 2041: The IDP demonstrates that the East Chelmsford Garden Community (Hammonds Farm) site is deliverable and can contribute to the Local Plan Review Development Trajectory as anticipated. The trajectory is therefore sound. We noted that objectors to Site 16a East Chelmsford Garden Community (Hammonds Farm) have criticised the adopted Local Plan for placing undue reliance on large scale garden community developments. This is not the case; out of a total housing supply of 18,473 homes including windfalls, the garden community allocations at East Chelmsford Garden Community of 3,000 homes (16%) and North-East Chelmsford (30%) contribute less than half of Chelmsford’s housing supply, supported by a wide range of sites at other scales. North-East Chelmsford is well advanced and represents the extended delivery of earlier allocations, whilst as evidenced above there is ample time during the plan period for East Chelmsford Garden Community to commence delivery, deliver infrastructure and meet the planned trajectory requirements. Furthermore, acting as single master developer and following the principles set out above, Wates Developments is motivated to bring the site forward at appropriate speed in order to support the Council in meeting its needs and to realise its investment. The full text of our Written Representations is provided as an attached PDF. Please refer to the PDF for the figures referred to. The supporting documents referred to are attached to our main response under Site Policy 16a or to this representation where expressly relevant.

Please set out the changes you consider necessary to make the Local Plan ‘sound’ including revised wording of any policy or text.
None.

Q4 If your representation is seeking a change, do you consider it necessary to take part and speak at the Examination?