HS064

FREETHS

CHELMSFORD LOCAL PLAN REVIEW 2022 – 2041
EXAMINATION HEARINGS: MATTER 6 – SITE SELECTION & LOCATION 3 – EAST OF CHELMSFORD, STRATEGIC GROWTH SITE POLICY 3B – LAND NORTH OF MALDON ROAD (EMPLOYMENT) & 3D LAND NORTH OF MALDON ROAD
HEARING STATEMENT ON BEHALF OF THE SPEAKMAN FAMILY
REPRESENTOR ID: 1381075
20th OCTOBER 2026

Introduction

1. We act as Town Planning consultants to the Speakman Family ("the Speakmans" or "the landowner") and Blenheim Consultancy Services Ltd ("BCSL"). The Speakmans are the majority freehold landowner of land proposed to be allocated under Policies 3b, 3c and 3d. BCSL are the Speakmans' development managers for the land.

2. We have been instructed by the Speakmans and BCSL to appear on their behalf at the forthcoming Chelmsford Local Plan ("CLP") Review Examination Hearing in relation to proposed allocations 3b and 3d. The preparation of this Hearing Statement follows the submission of Regulation 19 stage representations by BCSL on behalf of the Speakmans.

3. This Statement is structured to respond to the questions of relevance to both parties. Where this Statement does not respond to a specific question, it is either of no relevance, or we do not wish to advance any written evidence beyond that explained in the Regulation 19 representation.

4. We note the CLP is being examined under the December 2023 NPPF so all references in this Statement are from that version.

Matter 6 Questions

Site assessment and selection

Question 6.1 What was the Council's approach to site assessment and selection? What was the process and what factors were taken into account? What evidence is the Council relying on.

5. We consider this to be a question for the Council to answer. We can provide supplementary observations upon receipt of the Council's Examination Statement at the Hearing session.

Question 6.2 Is the approach of requiring masterplans/planning briefs an effective mechanism to secure sustainable development across the plan area?

6. We have no objection to the principle of using masterplans/planning briefs to secure sustainable development across the plan area. This is consistent with the NPPF (see specifically paragraph 129). To ensure soundness, there should however be flexibility in a site allocation policy wording and/or its future interpretation to allow for the submission and

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approval of a new and updated masterplan to reflect changes in planning status, development needs and alternatives. This is particularly relevant to these land allocations where the approved masterplan is out-of-date (see paragraphs 8-9 below).

Question 6.3 What is the current planning status of the site (e.g. masterplans, permission, completions)? Have there been any changes since the Plan was submitted for examination and if so, are any modifications needed?

7. The status of 3b and 3d has materially evolved during the formulation of the CLP since the first consultation stage in October 2022 and the text presented at paragraphs 7.146 (for 3b) and 7.176 (for 3d). We summarise the changes below.

Withdrawn 2022 Planning Applications

8. The two planning applications for mixed-use residential and commercial development referred to in that text were withdrawn in January 2025. The decision to withdraw followed a change in ownership of the housebuilder (Redrow) that had an option with the Speakmans for their allocated land.

Permitted 2021 Masterplan

9. The approved February 2021 masterplan prepared by Redrow informed the schemes proposed by the withdrawn planning applications. That masterplan is therefore now out-of-date and needs to be revisited to reflect the status of both sites, to ensure the development opportunities they present are optimised and it is updated to meet changing needs.

10. Due to the change in land use and development strategy, a new masterplan will accordingly need to be prepared and approved for the 3b land and potentially 3d to replace the February 2021 version. This will proceed during 2027. We propose the reference to the approved masterplan is therefore deleted as it is no longer of relevance.

Park & Ride Extension

11. Essex County Council ("ECC") granted itself planning permission for a westward expansion of the Park & Ride facility ("P&R") on 26th November 2024 (Ref: CC/CHL/109/23). This is on land owned by the Speakmans. As ECC has no legal interest in that land, it can only deliver the scheme via CPO. The Speakmans have objected to a proposed CPO which is the subject of a Public Inquiry commencing in November 2026.

12. An alternative northwards P&R expansion scheme is being prepared by the Speakmans and will be the subject of a planning application to the Council in late October 2026. This proposal avoids the need for a westward expansion and thus renders a CPO of their land unnecessary. It also frees up valuable land in the 3b allocation and future masterplan site area to maximise its potential for commercial development, consistent with the objectives of the allocation.

13. The ability to deliver an alternative P&R scheme ensures a key vision of the Local Plan and a requirement of draft Policy S9 can be achieved. It will also ensure there is no prejudice to the ECC's Army & Navy junction sustainable transport package (see Document Ref: TO10) which

a Sandon P&R extension forms part of. Reference to a westward expansion in the supporting text is therefore not necessary or justified. The site area requirement should also be removed to allow for flexibility in the final car parking numbers required rather than a set area.

Future Masterplan Strategy & Allocation Area

14. As explained in BCSL's Regulation 19 representation, the historic masterplan reflects the objectives of the historic planning applications. It does not optimise the development potential of the 3b land, nor does it take advantage of the proximity to the A12, P&R and planned residential growth in the area which can attract the scale and type of commercial/employment generating uses this site can attract.

15. The spatial extent of the 3b allocation also places a potentially unnecessary constraint on the overall developable area and the important potential it offers for Chelmsford's economic and social growth.

16. As indicated on the layout plans provided in the Regulation 19 representation, we recommend the Council consider an eastwards extension of the employment development area on currently unallocated land adjacent to the A12. Whilst this land forms part of the proposed/extended urban area and thus could be brought forward in tandem with a scheme on 3b, it offers an opportunity to extend the capacity of the site allocation.

17. We cannot identify any constraint that would prevent such an extension. The Landscape Sensitivity & Capacity Assessment 2017 (Document Ref: PL0004) assessed this land as part of the overall allocation land parcel (Ref: SLP2, see pages 20 and 241). There was no difference in landscape sensitivity or other constraints identified which would justify exclusion of this parcel from the overall site allocation. It can therefore form a natural extension to the 3b allocation within the extended urban area and physically integrate with the level of development proposed on this site. There is also no reason to retain this site as non-developable.

18. This land parcel does lie outside of the Speakman's ownership but there is an agreed position with the private landowner (Northern Trust Land) such that it can form part of the overall extended masterplan for 3b.

19. The site is available, deliverable and without any physical constraints should be included in an extended 3b area.

20. To provide the flexibility for strategy, the Plan should therefore remove reference to the approved masterplan and allow for the submission of a future masterplan, particularly for the 3b land. The spatial extent of the 3b site allocation should also be extended as described.

Future Planning Applications & Delivery

21. A comprehensive commercial/employment generating led planning application including an extension to the P&R facility on the 3b land and area to the north is expected to be made in 2027. Pre-application discussions with the Council are expected to commence in early 2027.

22. We expect that a new residential led planning application will be made for the 3d land in 2027.

23. It remains the expectation that the 3b and 3d sites will both be delivered by 2031.

Recommended Modifications

24. Our proposed modifications are presented at paragraph 38 overleaf. We also justify and propose revised wording for the proposed land uses in response to Question 6.5.

Question 6.4 For the housing sites, what is the basis of the proposed capacity?

25. We consider this to be a question for the Council to answer in relation to 3d and its housing capacity. We can provide supplementary observations upon receipt of the Council's Examination Statement at the Hearing session.

Question 6.5 For the sites which include non-residential uses, what is the basis for the scale and type/mix of employment and other uses proposed?

26. We understand the amount and type of development proposed for 3b has been rolled forward from the adopted Local Plan. For the reasons explained in the Regulation 19 representation the allocated non-residential uses need to be re-worded to be positively prepared and justified based on the latest evidence.

27. The Speakmans continue to have no objection to the early years and childcare nursery. The rationale for that use remains as explained at paragraph 7.150.

28. The allocation for an office/business park and the quoted approximate scale of E(g) or other appropriate B class uses unnecessarily (and potentially unintentionally) constrains the site's potential and the value of the site-specific opportunity that it offers Chelmsford and this growth area. The scale and land use description is too specific and does not offer flexibility to adapt to changing economic circumstances as recommended by the NPPF (see paragraph 86 d)).

29. The Regulation 19 representation proposed leisure or commercial use be added to the proposed uses. The flexibility to introduce employment/commercial and/or leisure floorspace can assist the master planning process. It can provide the landowner with flexibility to optimise the site's potential, balanced against its key constraints, to deliver the site effectively within the Plan period.

30. Commercial floorspace is expected to include Use Classes E.g and B. The introduction of employment/commercial will make an important contribution towards meeting the significant needs for new employment floorspace identified in the Plan (see the TP014 Topic Paper).

31. Any commercial scheme on this land parcel may also include Sui Generis uses which generate employment and have economic development and social benefits. The flexibility to incorporate Sui Generis uses is already allowed for in the wording of Policy DM4. Any scheme which proceeds with such uses will need to demonstrate its appropriateness for this location under Policies DM4 and S12.

32. Leisure floorspace (Use Class E(d)) will also have an important role in supporting the needs of existing and prospective residential communities in the area and can generate employment. This should also demonstrate its appropriateness for this location. This reference is included in the proposed land use wording to ensure soundness.

33. This and the following reasons therefore justify a widened land use context for the allocation:

    (i) To be sufficiently flexible to ensure it can contribute towards Chelmsford's economic vision and strategy.

    (ii) The change in macro-economic and site-specific circumstances that has occurred since the 2020 adopted Plan. Whilst rolling forward a site allocation is welcomed in principle, the exact requirements should be updated due to the passage of time.

    (iii) The need to refresh the site's overall capacity to meet current commercial requirements via the masterplan update and the proposed extension to its employment generating capacity via the proposed extended land allocation.

    (iv) There is no specific evidence base or justification which limits the employment floorspace to an office/business park of circa 5,000 sq.m net. The allocation should be worded to be flexible and market responsive (in line with Policy S8 and NPPF paragraph 86 b) and d).

    (v) To contribute towards the employment needs identified in the up-to-date employment evidence base (see TP014) which extend beyond offices and can still meet the objectives of Policy S8.

Question 6.6 Are the development requirements clear, and are any further safeguards or mitigation measures necessary to achieve an acceptable form of development?

34. The development requirements for both policies are clear, subject to our recommended modifications proposed in the policy and reasoned justification text (see paragraph 38 below).

Question 6.7 What is the expected timescale and rate of development for the housing sites and is this realistic?

35. See our response for 3d at paragraphs 22-23 above.

Question 6.8 Are any modifications to the policy needed for soundness?

36. Yes, based on the responses above, our proposed modifications are presented at paragraph 38 below.

Location 3 Questions

d. Is there evidence that sites 3b, 3c and 3d are available and capable of being delivered within the plan period?

37. The engagement of the Speakmans in the Local Plan preparation process including their Regulation 19 representation and this statement provides adequate evidence of both their intentions for this site and availability. This has satisfied the Council in rolling forward the proposed allocations from the Local Plan and is sufficient for plan-making and soundness purposes.

Overall Conclusions & Proposed Modifications

38. Against this background, for the CLP to achieve soundness based on our client's specific objections, we recommend the following modifications (new text in ***bold*** / deleted text ~~*struck through*~~).

Policy 3b Land North of Maldon (Employment):

(i) Proposals Map to be amended to extend the spatial extent of the 3b site allocation to match land parcel ref SLP2 (see Document Ref: PL0004).

(ii) Amount and type of development list to also include the following additions:

- ***Employment comprising Use Class E.g floorspace and/or other appropriate B Use Classes***.
- ~~*Around 5,000sqm (net) new Use Class E9g) floorspace, other appropriate B Use Classes.*~~
- ***Leisure (Use Class E.d) and other employment generating uses as appropriate for this location***.

(iii) Paragraph 7.146 to be revised to reflect the current planning status of the site:

~~The site has an approved masterplan (Ref:20/00003/MAS) and a planning application has been submitted for up to 5,000sqm of commercial floorspace and provision of a day care nursery (Ref:22/00916/FUL and 22/0916/OUT).~~ The site is expected to be delivered ***by*** *~~between 2025 and~~ 2031. As such this allocation will support Chelmsford's economic growth by providing new employment floorspace and jobs. This allocation is located to the east of Great Baddow and north of Sandon, close to local services and facilities in these locations. It is one of four development sites East of Chelmsford.*

(iv) Paragraph 7.149 to be revised to reflect the proposed land use additions:

The development should provide a mix of type and range of sizes of ~~Use Class E(g)~~ employment units to help Chelmsford accommodate the predicted growth in economic development and identified need for new jobs which include the business sectors identified in Policy S8. To ensure flexibility and market responsiveness, ~~other complementary~~ B2 and B8 Use Classes, ***leisure (Use Class E.d) and other employment generating uses*** *may also be*

appropriate as part of the allocation ***where it is demonstrated they are appropriate for this location****.*

(v) Paragraph 7.153 text to be deleted and replaced with the following to reflect the current planning status of the site:

The development will accommodate or facilitate the future expansion of Sandon Park and Ride with the area required to be agreed through discussions with Essex County Council.

Policy 3d: Land North of Maldon Road

(vi) Paragraph 7.176 to be revised to reflect the current planning status of the site:

~~The site has an approved masterplan (Ref:20/00003/MAS) and a planning application has been submitted for up to 65 new homes (Ref:22/00916/FUL and 22/0916/OUT). This number is reflected in the 5 Year Housing Site Schedule April 2024. If this proposal is not implemented and a new proposal comes forward,~~ **T**he site capacity will be considered on its individual merit. Development is expected to ~~be delivered between 2025 and~~ **by** ~~2029~~ **2031**.

We look forward to discussing this submission at the forthcoming Local Plan Examination Hearing.

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