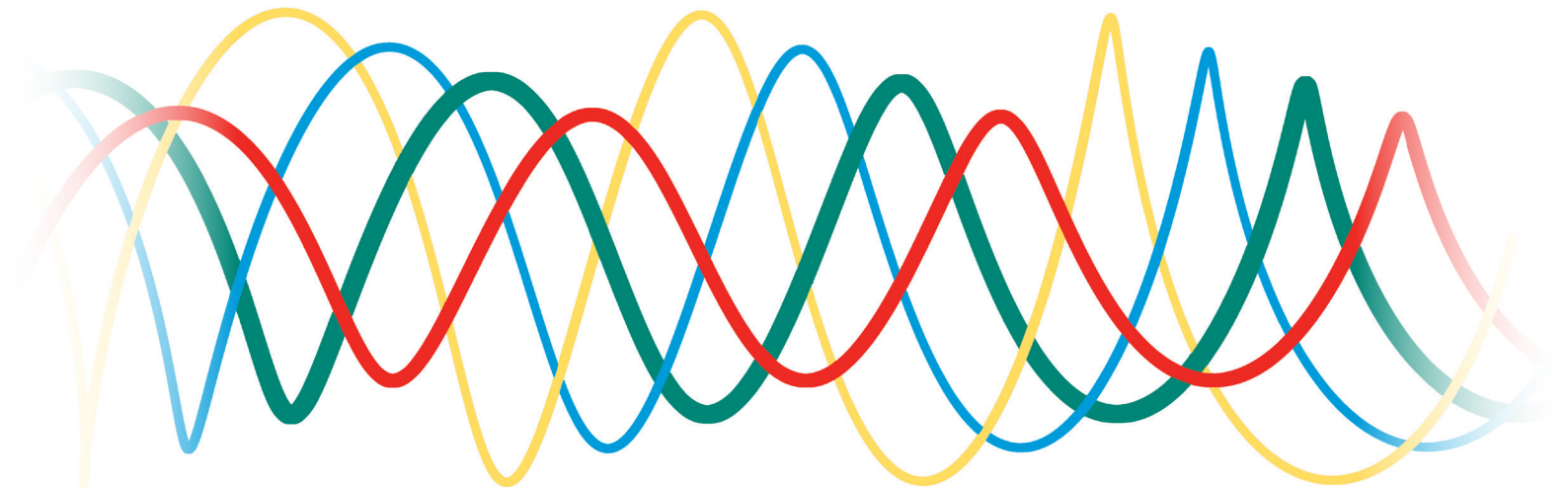


# HAMMONDS FARM

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INDEPENDENT EXAMINATION OF THE CHELMSFORD DRAFT LOCAL PLAN

**ID 872955**

**MATTER 7**

EMPLOYMENT AND RETAIL DEVELOPMENT



GROSVENOR

HAMMONDS  
ESTATES

## Matter 7 – Employment and Retail Development

- 7.1 On behalf of Grosvenor Developments Limited ('Grosvenor') and Hammonds Estates LLP ('Hammonds Estates') who are development partner and landowner of Hammonds Farm respectively ('the promoters'), the following information is provided in regard to Matter 7 – Employment and Retail Development and relevant issues raised by the Local Plan Inspector to inform the forthcoming Local Plan Examination.
- 7.2 Hammonds Farm is located on the eastern edge of Chelmsford, north of the A414 and east of the A12. The site extends to approximately 568 hectares.
- 7.3 The promoters have been fully engaged with the local plan process so far, and submitted representations to the Regulation 19 consultation in relation to Hammonds Farm and other matters.
- 7.4 The site has the potential to deliver circa 5,000 dwellings (2,600 within the plan period), together with the associated infrastructure and open space required. The vision for this sustainable new village has social value, health and wellbeing at its heart, and would provide public access to extensive new areas of green infrastructure, such as a country park.
- 7.5 Hammonds Farm would provide a distinct offer, in a different location to other strategic allocations, offering a diversity of product to suit a diverse community and a package of other benefits that can only be deliverable on a large-scale site such as this. With a single landowner and an expert master developer, both committed to long-term stewardship and the delivery of social value, Hammonds Farm is uniquely placed to provide a new community that promotes social and physical interaction and enables healthy choices within an attractive setting, a 'community for life' (see section 4 and appendix 8 Hammonds Estate's representation (PS1045)).

**Main issues – Whether the Plan sets out a positively prepared strategy for the delivery of employment land and retail development to meet identified needs within the Chelmsford area, that is justified and effective. Whether the policies for employment sites, the city centre, town centre and neighbourhood centres are sound?**

### Context

The Council's 'Delivering Economic Growth in Chelmsford to 2036' report (EB076) and the June 2018 update (EB080) states that between 2014-2036 16,675 new jobs will be needed, equating to a requirement of 725 jobs a year. The evidence suggests that these new jobs will be potentially delivered as follows:

- 5,349 through delivery of new employment space at 4 locations during the Plan period consisting of 55,000 sqm employment floorspace and 13,400 sqm retail floorspace;
- 3,333 through an existing commitment for 40,000 sqm of new office floor space at the Greater Beaulieu Business Park;

- 4,737 through existing vacant floorspace;
- 3,197 through other existing commitments; and
- 1,600 through increases in self-employment (70 jobs per year).

The Chelmsford Retail Capacity Study 2015 (EB077) identifies 'capacity to support up to 4,500sqm net large-format convenience floorspace in Chelmsford by 2020, growing to up to 6,700 sqm by 2025...' with capacity '...peaking at up to 11,500 sqm net by 2036'. In addition, it suggests a modest amount of surplus convenience floorspace capacity at South Woodham Ferrers of around 1,900 sqm net by 2036.

## Requirements

**41. Does Strategic Policy S8 clearly set out the employment requirements and will it ensure that the Plan meets the objectively assessed employment needs identified? Does the 55,000 sqm of employment land take into account any employment land lost to other uses in recent years?**

7.6 The promoters have identified a lack of clarity on the level of employment growth that is being planned for, together with disparities in the employment evidence as to the forecast job growth figures (see appendix 2 of Hammonds Estate's representation (PS1045)), There is therefore doubt as to whether the level of employment growth provided for is justified in light of the evidence.

**42. Does Strategic Policy S10 accord with paragraph 154 of the Framework which states that local plans should only include policies that provide a clear indication of how a decision maker should react to a development proposal, identifying what will or will not be permitted and where? How will the principles in the policy 'underpin the approach to economic growth and diversification? Are they justified and consistent with national policy?**

7.7 No comment

**43. Does Strategic Policy S8 clearly identify the retail development needs for the Plan period? Are the requirements based on credible evidence and are they justified and deliverable?**

7.8 No comment

## Employment Land Supply

**44. Strategic Policy S9 identifies a total of 9,000 sqm of net new employment floorspace in GA1. Is this provision justified and are the site allocations sound?**

**a. 4,000 sqm is to be provided in Location 1 (previously developed sites in Chelmsford Urban Area). Where is this allocated?**

- b. 5,000 sqm of B1 office/business park floorspace is allocated in Strategic Site 3b in Location 3 (Land north of Maldon Road). The supporting text also refers to the provision of other complementary B use classes as part of the allocation. Should this be made clear within the policy?***

7.9 No comment

- 45. Strategic Growth Site 1a consists of 6 sites and in addition to residential development refers to ‘an element of non-residential development’, ‘integration of flexible workspace facilities’ and a ‘commercial interface’. Is it clear to a decision-maker what this means and what type of development would be acceptable in this location?***

7.10 No comment

- 46. Strategic Policy S9 identifies an existing commitment for 40,000 sqm of office and business floorspace in GA2.***

***a. Is the policy allocating this existing commitment?***

***b. An additional 45,000 sqm of employment floorspace is allocated in Strategic Growth Site 4 within the new Garden Community. Is this allocation and the requirements of the policy for employment justified?***

7.11 It is not clear whether Strategic Policy S9 re-allocates the existing employment commitment at Growth Area 2.

7.12 The provision of 45,000sqm of employment space at North East Chelmsford, representing 82% of total new employment within the PSP, will continue the pattern of providing further employment in the same location, given that the NCAAP (EB120) allocated 40,000sqm of commercial floorspace at Beaulieu and Channels.

7.13 Whilst outline planning consent for the Greater Beaulieu Business Park was granted in 2014, reserved matters consent has not yet been sought by Countryside. The Employment Land review (EB073) identifies that the earliest that any employment space will be delivered at Beaulieu and Channels will be around 2018/19. No employment space has been delivered to date and reserved matters consent has not yet been sought for its development. There is therefore a delay to the delivery of this employment land.

7.14 In light of the above, there are in essence two allocations for 85,000sqm of employment space to the north east of Chelmsford, providing little variety or choice for prospective occupiers. The absence of choice of location and delay to delivery of the existing allocation confirms that the PSP is not justified and that it is not deliverable.

- 47. Strategic Policy S9 identifies 1,000 sqm of flexible business space at GA3 in Location 7 South Woodham Ferrers. Is the policy clear on***

***what ‘flexible business floorspace’ is? Is this allocation and the requirements of the policy for employment justified?***

7.15 No comment

***48. Strategic Policy S10 states that existing employment areas are identified on the Policies Map. Are these the Employment Areas and Rural Employment Areas referred to in Policy EM1? Is the wording in the policies consistent? Have these sites and their boundaries been appropriately assessed and selected and are they justified?***

7.16 No comment

***49. Policy EM1 seeks to protect employment uses within Employment Areas, Rural Employment Areas and new employment sites.***

- a. Whilst Employment Areas and Rural Employment Areas are shown on the Policies Map are these designations and if so, in which policy is this set out?***
- b. In circumstances where there is no reasonable prospect of a site being used for employment, does the policy allow sufficient flexibility for considering alternative uses, in accordance with paragraph 22 of the Framework?***
- c. What would be the circumstances against which such a judgement would be made and is this clear to a decision-maker?***
- d. Is it appropriate to restrict Class A use classes in considering redevelopment or change of use for such sites?***
- e. Is the policy effective and justified and consistent with national policy?***

7.17 No comment

***50. Will the Plan ensure that Chelmsford’s need for jobs and employment land are met? Will an adequate quantity and range of land be made available?***

7.18 The PSP will not provide the level of jobs and employment required to meet identified need, due to the disparities in the employment evidence as to the forecast job growth figures (see appendix 2 of Hammonds Estate’s representation (PS1045)).

7.19 The PSP appears to re=allocate 40,000sqm of employment space currently allocated in the NCAAP, and allocate 45,000sqm of new employment space in one area north east of Chelmsford. The new employment space represents 82% of total new employment space allocated in the PSP. This will not provide a sufficient range of land within the plan area to provide variety and choice and is not justified.

- 7.20 Land at East Chelmsford is sustainably located in relation to key transport corridors. Whilst the proposed employment space is relatively small-scale, there is an opportunity to provide a new employment hub around junction 18 of the A12, with further employment land available at Hammonds Farm, as part of a wider, sustainable new community. The allocation of land either side of junction 18 would go some way to balancing the significant employment space that is proposed to be focussed at a single location in North East Chelmsford and ensure that the PSP is made sound.

### **Special Policy Areas**

51. *The Plan designates 6 Special Policy Areas (SPA) outside the built-up areas as defined in Strategic Policy S9, Policies SPA1-SPA6 and on the Policies Map.*
- a. *Is the Plan clear on how SPA designation will be used to support functional and operational requirements at these locations?*
  - b. *Is it appropriate for Policy SPA1 to require the proposed development at Strategic Growth Site 6 to provide an access road to the hospital from Main Road? What safeguarded route is referred to within the SPA and is this justified?*
  - c. *Both the Hanningfield Reservoir SPA and Writtle SPA lie within the Green Belt. Are the designations and policy requirements in Policy SPA3 and SPA6 consistent with national policy on Green Belt?*
  - d. *Are the Sandford Mill SPA designation and policy requirements in Policy SPA5 consistent with its location within a Green Wedge designation?*
  - e. *Overall are the SPA designations and their boundaries sound? Are any changes, such as those proposed by the Council in SP002, necessary for soundness?*

- 7.21 No comment

### **Retail development and role of centres**

52. *Does the Plan clearly set out where the new retail development is to be located and is this justified by robust evidence?*

- 7.22 No comment

53. *In relation to Strategic Policy S14 and Policy EM2:*

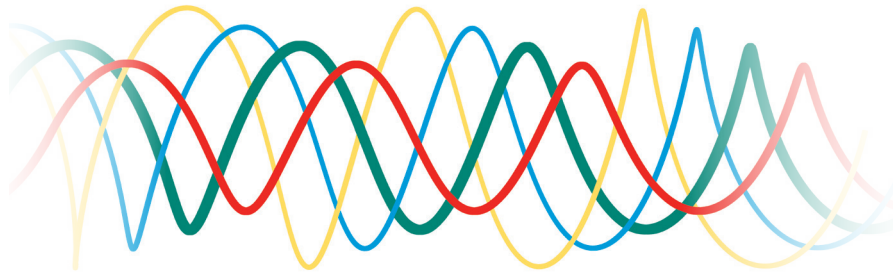
- a. *Is the retail centre hierarchy set out in Strategic Policy S14 justified by the evidence?*
- b. *Is the Council's approach to centre boundaries, primary shopping areas and frontages justified and consistent with national policy? On what basis have the boundaries of these areas been defined? Do the policies make clear which uses will be permitted in which locations? Are the criteria set out in Policy EM2 sound?*

- c. Paragraph 6.87 of the Plan indicates that main town centre uses outside the designated centres will be considered in accordance with the Framework, including use of the default threshold of 2,500 sqm gross floorspace. However it also states that an impact assessment below this threshold may be required under certain circumstances. Should this be set out in policy? Is it necessary to include a policy differentiation between out of centre and edge of centre retail development?*
- d. Some of the site allocations (such as Strategic Growth Site S2) refer to neighbourhood centres as supporting on-site development. Are these new designated centres and if so is this clear and reflected within the hierarchy set out in Strategic Policy S14 and Policy EM2?*

7.23 No comment

# HAMMONDS FARM

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**Hammonds Estates**  
Suite 1, Building 3  
Abbey Barns  
Duxford Road  
Ickleton  
Cambridge CB10 1SX

**Grosvenor Developments Ltd**  
70 Grosvenor Street  
London, W1K 3JP

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