Broomfield Neighbourhood Plan Regulation 16 Consultation

Schedule of responses received

Response ID	Name	Organisation	PID No	Consultation Point
BNP-1	Mr Martin Crisp	Essex Bridleways Assiociation	1356287	Natural Environment 6, Traffic and Travel, Policy BFD15 PROW
BNP-2	Mr Kevin Fraser	Essex County Council	311148	Wide range of comments across the NP
BNP-3	Mr Abu Reaz Alam	Public	1359599	General
BNP-4	Mr Mohammad Muqtadir Samy	Public	1359948	General
BNP-5	Mr K W Fong	Public	1359952	Policy BFD10 - Land East of Saxon Way
BNP-6	Ms S W Chan	Public	1359951	Policy BFD10 - Land East of Saxon Way
BNP-7	Dr Mohammad Kabir	Essex Muslim Centre	1359598	General
BNP-8	Mr Chanchal Khan	Public	1359955	General
BNP-9	Mr Md Taifur Ripon	Public	1360009	General
BNP-10	Mr Mohammad Bari	Essex Muslim Centre	1360008	General
BNP-11	Mr Hasan Chowdhury	Public	1359994	General
BNP-12	Dr Hossain Hadi	Essex Muslim Centre	1359930	General
BNP-13	Mr Md Moududur Rahman	Public	1360073	General
BNP-14	Mr Jahir Uddin	Public	1360070	General
BNP-15	Mr Mohammad Hasan Murad	Public	1360022	Community Action CA12
BNP-18	Mr Mohammed Rahman	Public	1360109	General
BNP-19	Mohammad Islam	Public	1360117	General
BNP-20	Mr Mohammad Tanvir Ahmad	Public	1360115	General
BNP-21	Mr Bibi Afrose	Public	1360203	General
BNP-22	Mr Michael Priaulx	Swifts Local Network: Swifts & Planning Group	1360192	Section 6. Natural Environment
BNP-23	Chelmsford City Council	Chelmsford City Council	1252951	Para 2.14
BNP-24	Chelmsford City Council	Chelmsford City Council	1252951	Para 3.15
BNP-25	Chelmsford City Council	Chelmsford City Council	1252951	Para 4.4
BNP-26	Chelmsford City Council	Chelmsford City Council	1252951	Policy BFD8 - Housing Mix
BNP-27	Chelmsford City Council	Chelmsford City Council	1252951	Policy BFD10 - Land East of Saxon Way
BNP-28	Abu Akanda	Public	1360084	General
BNP-29	Shamsul Hoque	National Highways	1338584	Para 1.4 - Vision Statement
BNP-30	Shamsul Hoque	National Highways	1338584	Para 11.4 - Traffic and travel
BNP-31	Shamsul Hoque	National Highways	1338584	Para 7.4 - Housing
BNP-32	Mark Hembury	Broomfield Parish Council	1157089	General
BNP-33	Nick Baseley (for Agent)	Roka Nixy Ltd	1360491	Map 6; and site information
BNP-34	Mr Dave Vicary	Public	311259	Policy BFD10 - Land East of Saxon Way; Community Action CA14
BNP-35	Mr Mark Bewsey (for agent)	Obsidian Strategic Asset Management Ltd	1326424	Vision; BFD2; BFD6; BFD8; BFD10

Discounted representation:

BNP-17	Mr Alan Martin	1360078	3	Made in error - moved to Local Plan Prefrerred Options
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Event Name

Consultee Mr Martin Crisp (1356287)

Email Address Essex Bridleways Association

Company / Organisation New House

Address St Giles Close
Halstead

CO9 2RW

4. Broomfield Neighbourhood Plan Reg 16

Consultation

Essex Bridleways Association (Mr Martin Crisp

-1356287)

Comment by
BNP-1

DINE-

Comment ID 22/05/24 14:15

Response Date Processed

Status Web

Submission Type 0.2

Version

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / community action / appendix number below

Natural Environment 6, Traffic and Travel, Policy BFD15 PROW

Question 2

Please add your comments below

Essex Bridleways Association is disappointed to note the lack of awareness and significance attributed to horse riders as a user group. In the Plan, emphasis is placed on cyclists, with regular mention of new cycle paths to be created in the countryside, and new rural cycle paths etc. There is no mention of equestrians as a user group and this appears discriminatory. The creation of new bridleways would provide new routes to all user groups, ie pedestrians, cyclists and horse riders and would be a far more equitable approach than the proposed stance which appears to give preference to the requirements of cyclists. We would ask that the Plan be adjusted to correct this imbalance.

Question 3

Do you wish to be notified of the decision on the Yes Broomfield Neighbourhood Plan?



Consultee Mr Kevin Fraser (311148)

Email Address

Company / Organisation **Essex County Council**

Address County Hall

Chelmsford CM1 1LX

Event Name 4. Broomfield Neighbourhood Plan Reg 16 Consultation

Comment by Essex County Council (Mr Kevin Fraser - 311148)

Comment ID BNP-2

Response Date 13/06/24 09:10

Processed **Status**

Submission Type Email

Version 0.3

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / General community action / appendix number below

Question 2

Please add your comments below

See attached representation.

Question 3

Do you wish to be notified of the decision on

the Broomfield Neighbourhood Plan?

Yes

If you wish to submit any supporting information, please upload it here

ECCresponsetoBroomfieldReg16ResponseSubmit.pdf



19th June 2024

Spatial Planning
Essex County Council
County Hall
Market Road
Chelmsford, CM1 1QH

Planning Policy Team Spatial Planning Services Chelmsford City Council Civic Centre Duke Street Chelmsford CM1 1JE

By email: planning.policy@chelmsford.gov.uka

Dear Sir/Madam,

RE: BROOMFIELD NEIGHBOURHOOD PLAN (REGULATION 14) - 2022 - 2036

Thank you for consulting Essex County Council (ECC) on the Broomfield Neighbourhood Plan (the **Plan**). ECC provides the following response, which reflects ECC's role as the Minerals and Waste Planning Authority, the Highway Authority, the Transportation Authority, the lead authority for education (including early years and childcare), the Lead Local Flood Authority and our responsibility for providing and delivering adult social care (ASC) and public health services. Comments also reflect ECCs lead role covering climate change and net zero carbon and green and blue infrastructure.

The ECC response outlines where changes need to be made to ensure ECC can deliver its statutory responsibilities and recommends other changes for your consideration. Although the **Plan** does not make any site allocations, any growth through windfall development will need to be assessed, including infrastructure requirements, any mitigation, and how they will be funded and delivered.

Everyone's Essex

Everyone's Essex, the Council's new organisation strategy, sets out a strategic aim for a strong, inclusive and sustainable economy. This strategic aim includes a commitment to deliver and maintain high quality infrastructure to support a growing economy and the delivery of new homes and communities. Achieving this requires us to ensure that the development, planning and infrastructure delivery across the administrative county, can be aligned and support the Local and Neighbourhood Plans that are being prepared across the county, at its borders and beyond. This is to ensure that the planned growth includes provision for the delivery of ECC's infrastructure and services commensurate with the growth being planned, and to support existing and future residents and businesses.



The response that follows reflects the order of the **Plan**.

Chapter 1 - Vision and Objectives

Housing Objectives

ECC recommend an amendment to bullet 2 to ensure consistency with our comments to Policy BFD9 – Adaptable Homes. ECC seeks to ensure that housing and communities are accessible and inclusive over the life course and that new homes are suitable for ageing households and those with disabilities so that they can live in their homes for longer if their mobility reduces.

• To ensure there is an integrated mix of housing types, sizes and tenures to meet local need including accommodation that is or can be made adaptable for a variety of life stages, including independent living housing for older people and people with disabilities. elderly accommodation and care,

Natural Environment Objectives

ECC recommend the Plan should place more emphasis on the multifunctionality of green and blue infrastructure consistent with the Essex Green Infrastructure Strategy as prepared by the Essex Green Infrastructure Partnership (including Chelmsford City Council and other local and national bodies). Section 5.1 of this Strategy provides examples of this multi-functionality, including recreational and active-living supporting healthy lifestyles (both physical and mental well-being); green travel routes; habitat provision involving the conservation and enhancement of biodiversity; heritage and cultural assets providing landscape, place quality and amenity; food production and productive landscapes; pollution absorption and removal; flood attenuation and water resource management; and access to nature.

ECC recommends reference is also made to the Essex Green Infrastructure Standards-Technical-Guidance (June 2022), which should be used as part of the Plan's evidence base. The latter, endorsed by Natural England, was published in June 2022 and will be added to the Essex Design Guide (EDG) in due course. The Essex Green Infrastructure Standards (Section 2, pages 10 and 11) include nine principles and standards for the protection, enhancement, creation, and management of Green Infrastructure (GI) in Essex. GI and open space should be approached from a multifunctional perspective, combining uses such as sustainable drainage, public open space, walking and cycling routes and biodiversity conservation to combine functional uses with amenity benefits.

ECC suggest the following amendments are made to the Objectives:

Natural Environment Objectives 1 and 3

- To protect and enhance biodiversity, <u>including biodiversity net gain for new developments</u>, responding to the threat of climate change
- To create and enhance public green open spaces, <u>ensuring spaces are multifunctional in</u> order to maximise health and well-being benefits to the community

Development Design Objective 4 and New Objective

- To encourage new development to incorporate measures that reduce environmental impact through a network of multifunctional Green Infrastructure
- New developments should incorporate biodiversity net gain

Historic Environment Objectives

ECC recommend bullet 1 is amended to make reference to the contribution made by the setting of designated and non-designated heritage assets consistent with National Planning Policy Framework (NPPF), paragraph 194 and Section 8 – Heritage Assets.

• To conserve and where possible enhance all aspects of the historic environment - built heritage and their setting, archaeology and historic landscape features

Traffic and Travel Objectives

ECC note that some of the suggested amendments have been incorporated into bullet 2. However, ECC recommend the following changes to be consistent with correct terminology with regards changing cycle paths to cycle routes and pavements to footways throughout the Plan.

 To encourage cycling and walking by creating new safe cycle routes (cycle paths) and footpaths; and by protecting existing footways (pavements), cycle routes (cycle paths), footpaths and public rights of way

Chapter 2. Introduction to the Neighbourhood Plan

For consistency with NPPF, paragraph 13, ECC recommend reference to `main policies' should be amended to `strategic policies' in paragraph 2.4. The Consultation Statement (page 54) states that the `main' will be amended to `strategic' but has not been implemented in the Plan.

It must also be in general conformity with the <u>strategic</u> main policies of the local plan - it cannot simply override them.

For clarity, ECC recommend reference is made to the Local Development Plan in paragraph 2.5 to clarify that once `made' the Plan will form part of the Chelmsford Local Development Plan and planning applications will be required to be determined against them both.

However, once it has been through all these stages successfully and `made', the neighbourhood plan forms part of the legal planning framework for the parish or neighbourhood and all planning applications will be decided by reference to it <u>and the Local Development</u> Plan.

Chapter 4 – Planning Policy Context

Local Plan Context

ECC recommend the timetable for the Chelmsford Local Plan Review is amended to reflect that set out as part of the Preferred Options Local Plan consultation in May/June 2024. The Plan must also be in general conformity with the Local Plan rather than `had regard'. ECC recommend paragraph 4.4 is amended to read:

4.4 At the local level, a new Local Plan for the Chelmsford City Council area was adopted in May 2020. It provides up-to-date planning policies and identifies sites for development to meet the expected growth to 2036. The Local Plan provides the current strategic planning framework to which the Neighbourhood Plan has to be in general conformity with had regard. In Autumn 2022 the City Council consulted on Issues and Options for the review of the adopted Local Plan. A `Preferred Options' consultation was undertaken in May/June 2024 to extend the plan period to 2041. It is intended that this will extend the Local Plan period to 2041 and, at the time of the consultation, it was anticipated to undertake a `Pre-Submission' consultation in Spring 2025 and to that the new Local Plan would be adopt the Local Plan in late Spring 2025/early 2026.

ECC welcomes reference to the Plan requiring to be in general conformity with the strategic planning policies of the Chelmsford Local Plan (adopted in 2020), as well as the Essex Minerals Local Plan (MLP) (2014) and the Essex and Southend-on-Sea Waste Local Plan (WLP) (2017) and the wording set out in paragraph 2.14 and 4.7.

For information, a MLP Review has commenced to extend the plan period from 2029 to 2040. A second Regulation 18 public consultation was subject to public consultation until 9 April 2024. Following this consultation, the following stages could include:

- a more detailed technical assessment on candidate sites in light of comments received;
 and
- moving towards selecting Preferred Site allocations to inform a further consultation (Regulation 19 Pre-Submission), which may take place late 2024 or early 2025.

The Plan area includes land within a Mineral Safeguarding Area (MSA) due to the presence of sand and gravel deposits beneath the ground and Waste Consultation Areas (WCA) (see Appendix 1).

Within the Plan area there are WCAs in relation to the following sites:

 Essex Regiment Way - ESS/01/11/CHL - coated roadstone plant and associated facilities for the manufacture of coated roadstone products using predominantly sand and gravel and recycled aggregates produced at the quarry.

This area is allocated in the adopted MLP and safeguarded as a coated stone plant. Policy S8 - Mineral Consultation Areas (MCAs) seek to ensure effective mineral development and prevent future impacts upon neighbouring uses. An MCA is designated within and up to 250m from safeguarded permitted mineral developments.

 Dunmow Waste Management - ESS/17/17/CHL - Waste transfer and recycling facility for Local Authority Collected Waste

This area is subject to Policy 2 of the WLP which establishes WCAs at a distance of 250m (400m in the case of Water Recycling Centres) around permitted, allocated and existing waste infrastructure. ECC must be consulted on all applications for non-minerals and non-waste development proposed within these areas.

Community Action CA3 - Creation and Maintenance of Woodland and Hedgerows

Paragraph 3 makes reference to new cycle paths created in the countryside being lined both sides with hedgerow. Firstly, references to `cycle paths' should be amended to `cycle routes'.

Secondly, ECC, as the highway authority, would not advocate planting of hedgerows on both sides of new cycle routes because of perceived safety and security issues with routes enclosed by vegetation, and because of difficulty with maintenance of the hedgerows overgrowing the cycle routes. This position is also relevant to paragraph 11.16. If hedgerows were to be planted they should consider Department for Transport Local Transport Note (LTN) 1/20 Cycle Infrastructure Design, paragraph 15.2.21 which states that hedgerows should be set back at least 1.0m from the route and maintained in such a way that they do not overhang, encroach across, or drop thorns on the path (new plants adjacent to cycle tracks should be non-thorn varieties). Paragraph 15.5.10 also makes reference to the potential damage from tree roots and fallen leaves making routes slippery. ECC notes that the parish council considers this too detailed to include in the Plan, however it should be considered if this aspiration is progressed with regards any new cycle routes.

Policy BFD6 – Broomfield Green Wedge

ECC support the principle of establishing multifunctional greenways to promote sustainable and active travel movements and contribute to health and wellbeing. Their design will depend on whether they are to be within an urban or rural environment (ie the Green Wedge) and their function (recreational; commuting). Any design of new routes will be required to be consistent with Cycling infrastructure design (LTN 1/20) and to be coherent (allow people to reach day to day destinations easily); direct, safe, comfortable and attractive, as referenced in paragraph 1.5.2 of this guidance.

Proposals that secure enhanced access for recreational uses, including footpaths and cycle <u>routes</u> paths, in the Green Wedge will be supported, subject to the development being in accordance with the relevant strategic policies of the adopted Local Plan.

Community Action CA4 - Further Study of the Natural Environment

ECC notes that the parish council is to investigate the potential benefits of biodiversity mapping, as a means to better understand, conserve and enhance these aspects of Broomfield's natural environment.

ECC has published the Essex Green Infrastructure Strategy (2020) (where its preparation included Chelmsford City Council) and Essex Green Infrastructure Standards-Technical-Guidance (June 2022).

The Essex Local Nature Partnership (LNP) was launched in March 2022 and seeks to benefit Essex by:

- Preventing further loss of biodiversity and work towards reversing the decline
- Restoring habitats and wildlife
- Producing positive outcomes that integrate the needs of nature, people and the economy
- Enabling a diverse range of organisations and communities to work together to make the best use of our available resources
- Raising awareness of the value of Essex's environment to the economy and society

The LNP is preparing the Local Nature Recovery Strategy (LNRS), which is a statutory requirement, to establish priorities and map proposals for specific actions to drive nature's recovery. ECC are the Responsible Authority for delivering the Essex LNRS, which will cover Greater Essex. The LNRS will:

- Map areas of importance for biodiversity
- Map areas where nature recovery has been taken
- Describe the strategy area, its biodiversity and its opportunities for nature recovery
- Agree biodiversity priorities and identify potential measures for achieving them
- · Map areas that could become of particular importance in the future

A draft LNRS will be subject to public consultation over the Summer with the intention to publish by the end of 2024.

Further information can be viewed here.

Community Action CA6 - Improving Public Access to the Chelmer River Valley

ECC note the aspiration to create new cycle routes, footpaths and community open space at the east end of Saxon Way. Further clarification is sought as to whether footpaths refer to footways or Public Rights of Way. See comments above regarding Traffic and Travel Objectives (page 4).

ECC notes discussions are ongoing with landowners as any provision will require access to third party land. Such routes are not presently on any Local Highways Panel List for investigation.

Chapter 7 - Housing

Policy BFD10 – Land East of Saxon Way

ECC recommended this site should be subject to the pre-application highway advice process which provides an early indication of whether a proposal is likely to be acceptable to the Highway Authority or not and details of information that should be submitted with any application. Please refer to the following links for advice and charges. The Plan does not specify the proposed capacity of the site but the Broomfield Neighbourhood Plan Site Assessment Report (page 77) refers to the potential provision of 80 dwellings. A development of this scale would require a full Transport Assessment to be undertaken considering opportunities for sustainable transport measures; access; and impact on the highway network in terms of safety and capacity.

Any proposals for amendments to and/or the provision of new cycle routes/footways will need to involve consultation with ECC, as the highway authority, and Essex Highways. Consideration will need to be given to the feasibility of any proposed routes.

References to cycle paths should be amended to cycle routes. Further clarification is sought as to whether footpaths refer to footways or Public Rights of Way in bullet 1 and paragraph 2.

Policy BFD9 – Adaptable Homes

ECC, with its responsibilities for Adult Social Care, must ensure that the needs of vulnerable people are reflected in line with our duty under the Care Act 2014 and the wider prevention and maximising independence agendas. The adopted Essex Housing Strategy (2021 - 2025) seeks to ensure that new homes and places are designed for residents to live independent and healthy lives; homes are adapted and digital technologies adopted, to support residents to live independently; and access to high quality specialist and supported accommodation for those who need it.

ECC seeks to ensure that housing and communities are accessible and inclusive over the life course and that new homes are suitable for ageing households and those with disabilities so that they can live in their homes for longer if their mobility reduces. Allowing residents to live within their homes reduces their dependency on care provision and facilitates healthier, more independent lifestyles. Suitable housing can also allow people to live closer to their informal support networks (i.e. family and friends) as their mobility declines.

ECC is supportive of the proposed changes to Policy DM1 – Size and Type of Housing in the Chelmsford Preferred Options Local Plan consultation (May/June 2024), in particular Part Aii which increases the requirement for new dwellings to achieve requirement Part M, Category 2 (Accessible and adaptable dwellings) M4(2) of Schedule 1 (para 1) to the Building Regulations 2010 (as amended), from 50% to 100% within all development of 10 or more dwellings, as this will help to address the fact that the number of people with disabilities is likely to increase substantially with an ageing population.

ECC has commissioned a *`Supported and Specialist Housing and Accommodation Needs Assessment'* which is being undertaken by Housing Lin. The work commenced May 2024 and is expected to be completed by December 2024. The evidence base will include data on Chelmsford residents who need specialist accommodation to meet their needs due to their age, health, disability, mental health, cognitive ability or living with Learning Disability or Autism.

ECC welcome paragraph 2 subject to the suggested amendments below, which are consistent with the ECC policy position and technology improvements, and has been updated since the revised text was provided to the parish council after the Regulation 14 consultation. ECC has published its Digital Strategy for Essex (2022) which seeks to further expand digital infrastructure

and technologies, in addition to that being delivered by the Superfast Essex Programme. The Essex Design Guide (EDG) contains supplementary planning guidance for Planning for 5G and can be viewed here.

ECC recommend paragraph 2 of Policy BFD9 is amended to read:

Proposals for new developments or expansion of existing properties should be capable of receiving gigabit high speed and reliable mobile and broadband connectivity. Proposals will be supported where the appropriate cabling and ducting is provided to the premises and linked to infrastructure networks. Where connectivity is not currently available suitable ducting that can accept gigabit cable superfast broadband, fixed line gigabit cable broadband and/or 5G connectivity should be provided to the public highway or other suitable location.

Chapter 8 – Design Development

ECC recommend criteria v is amended to refer to `cycle routes'. All developments should be required to have regard to the Parking Standards Design and Good Practice. These parking standards are currently being reviewed by the Essex Planning Officers' Association (EPOA) and can be viewed here. They have been subject to two consultations with local planning authorities and developers. The standards are being revised to reflect changes in the new Use Class Orders and national planning policy. Different standards are required in different areas based on levels of accessibility, namely town centres (highly accessible); rural (poorly accessible); and other areas (moderately accessible). Details also cover electric vehicle charging requirements for both residential and non-residential uses. More detailed design guidance is also provided for both residential and commercial cycle parking taking account of LTN 1/20 guidance. Once these standards have been approved it is expected that they will be a material consideration to which new development will need to have regard to at an early stage of the design process.

v. Cycling should be encouraged by introducing cycle <u>routes</u> paths and providing bicycle parking and storage where appropriate.

Chapter 10 - Community Services and Facilities

Policy BFD14 – Land South of Broomfield Place

ECC has reviewed paragraphs 10.10 - 10.19 and Policy BFD14 regarding the proposed development of land south of Broomfield Place for a purpose-built facility to meet the needs of disabled adults and those with support needs. The information therein is considered to reflect the ECC position at present. ECC look forward to continued collaborative work with the parish council in bringing the proposals forward.

ECC supports criterion 1 in principle regarding the provision of `new walking/cycling routes linking the site to Main Road and School Lane' but would be subject to detailed consideration at the preapplication and application stage, along with access to the site.

Chapter 11 – Traffic and Travel

ECC recommend the reference to the ECC/Mouchel study (2007) is deleted from paragraph 11.2 and replaced with reference to the Chelmsford's Future Transport Network (CFTN), which forms part of the adopted Chelmsford Local Plan (2020) in paragraph 6.68 and Table 3. This sets out a vision for the Chelmsford's transport system to become 'best in class', offering enhanced connectivity, and access to opportunities for residents, visitors and businesses to support the sustainable economic growth of the city. It has 7 objectives with one specifically targeted at sustainable transport to offer an attractive and effective choice in the provision of sustainable travel (buses, cycling and walking) to encourage increased use and reduce pressure on the road

network. The Broomfield Road corridor is recognised within this Strategy as a key sustainable transport corridor.

ECC recommend reference is made in the Plan that, consistent with the CFTN, future proposals and strategies will be targeted to reduce traffic along Broomfield Road and encourage sustainable transport use. The permitted Chelmsford North-East Bypass (CNEB) will enable strategic transport movements to be made via the CNEB enabling the reclassification of A130 Essex Regiment Way as a sustainable transport corridor for local and city centre bound traffic. This subsequently encourages removal of city centre bound traffic from using Broomfield Road, thereby reducing traffic levels along the corridor for local residents and hospital users.

ECC support the aspirations in the Plan to encourage cycling and walking through the Travel Strategy - Encouraging Walking and Travel Strategy - Cycling. This approach is consistent with the CFTN (Mid Zone) which targets investment on providing alternatives to the private car and encouraging trips by fast and reliable public transport and safe high quality cycling and pedestrian network. Any proposals for amendments to and/or the provision of new cycle routes/footways and the Community Action proposals will need to involve consultation with ECC, as the highway authority, and Essex Highways. Any design of new routes will be required to be consistent with Cycling infrastructure design (LTN 1/20) and to be coherent (allow people to reach day to day destinations easily); direct, safe, comfortable and attractive, as referenced in paragraph 1.5.2 of the guidance.

Travel Strategy - Cycling

Current Cycling Infrastructure

Paragraph 11.12, bullet 1 makes reference to an off-road cycle path from Goulton Road to Broomfield Hospital, which is nearing completion. However, the proposed on-road section from Goulton Road to the City Centre is currently unfunded. The developers at North Broomfield are obligated to complete section 1 of the Chelmsford to Great Waltham cycle route from Goutlon Road to Corporation Road junction with Broomfield Road.

The final sentence makes reference to potential improvements linking the parish with Chelmsford Garden Community (CGC). Some of these are outlined below and in the CGC Development Framework Document.

- An active travel route across the valley via Croxton's lane to link in with Hospital Approach cycleway near the Chelmer Valley park and ride site.
- An active travel route between Broomfield and the CGC (the first being Mill Lane) would be
 via Little Waltham. CGC's contribution to this will be a traffic signal controlled crossing on
 Essex Regiment Way, to the south of the Wheelers Hill roundabout.
- Improvements to Essex Regiment Way (ERW), along the east edge of the parish, to make
 it into a Sustainable Transport Corridor (STC). The primary objective is to avoid bus services
 being delayed and thereby enabling services to be an attractive alternative to private motorvehicles. This would include services linking between the Park and Ride site and Broomfield
 Hospital.
- An Active Travel Route (ATR) is proposed from the new over-bridge (just north of the Chelmer Valley Park and Ride site) south to Nabbotts Farm Roundabout, whence it should connect with facilities along Chelmer Valley Road, White Hart Lane and Pump Lane. At present the alignment of the ATR has yet to be reached; but could be entirely along the west side of ERW itself or partly along Back Lane and Little Waltham Road. ECC will be looking for street lighting to be introduced as well as appropriate infrastructure to provide protection for pedestrians and cyclists from vehicular traffic.

• The ERW active travel route will provide means of access to Footpath 37, which is effectively a cul-de-sac path at present; however, a direct crossing to Regiment Business Park is not proposed at present, as it is not considered necessary for CGC.

Local Cycling and Walking Infrastructure Plans (LCWIPs), as set out in the Government's Cycling and Walking Investment Strategy provide a strategic approach to identifying cycling and walking improvements required at the local level. ECC previously identified 9 strategic corridors within the Chelmsford LCWIP within the urban area and these have been reviewed as part of the Chelmsford LCWIP refresh.

A consultation with a wide range of stakeholders was undertaken between August – October 2023 to seek views on the shape and extent of proposed routes, along with identifying routes not shown, any secondary routes that should be primary routes and any views on the suggested networks. The consultation responses have been reviewed and the following potential routes are being assessed using a Route Prioritisation Tool, which seeks to balance local need and value for money. The following routes have been identified in relation to the plan area but have not yet been subject to any route feasibility or design:

- Route 3 Chelmsford City Centre Beaulieu Park
- Route 3B Beaulieu Park School New Future Housing (Garden Community)
- Route 5 Chelmsford Rail Station Broomfield
- Route 5A Broomfield Hospital Anglia Ruskin University
- Route 5B Broomfield Road Melbourne Park New Future Housing (West Chelmsford)

Following route prioritisation the LCWIP will be published and its content used to inform future funding bids for their design and subsequent delivery. A countywide LCWIP is being prepared to develop routes connecting further out to more rural areas and connecting cities and towns across the whole of Essex.

ECC notes the ambition in paragraph 11.13 to achieve safe north/south routes to enable safe cycling from any part of Broomfield to the City Centre and train station. A few points to consider moving forward include:

- new development at the junction of the B1008/Woodhouse Lane is providing improvements
 to the footways along the frontage into Woodhouse Lane and northwards alongside Blasford
 Hill with drop kerb crossing over to eastern side for pedestrians only. Issues at this locality
 include the poor visibility out of Woodhouse Lane largely due to existing hedgerows
 meaning that the junction has substandard visibility and consequently should not be used
 to encourage cycle movements.
- there are paths through the Hanbury Place development, north of Hospital Approach but these are rolled gravel in nature and are not adopted highway.
- there is a cycleway alongside Hospital approach between Main Road and Court Road.
- there is a cycle route (mainly on the carriageway but a low trafficked route) through Hanbury Place from North Court Road to Hospital approach with two crossing islands on Hospital Approach.
- there are no cycleway facilities to the west of Court Road alongside Hospital Approach (the
 recent commercial development did not secure additional width for a cycleway) and
 alongside the ambulance station there is limited width to provide a cycleway.
- the North Broomfield development is required to pay a £300,000 contribution for new 'cycle facilities' between its new access roundabout and Croxtons Lane but at present no specific scheme has been identified/designed and been subject to feasibility assessment. The developers are also required to pay a £400,000 contribution towards the Essex Regiment Way bridge being provided by the CGC.

Travel Strategy - Encouraging Walking

Paragraph 11.22 makes reference to there being no zebra or pelican crossing near Chelmer Valley High School. ECC would seek the parish council to provide evidence that there is current demand for a crossing at this location.

<u>Travel Strategy - Encouraging Bus Use</u>

ECC recommend paragraph 11.27 is amended to reflect the current pricing of £2 per single fare across Essex until the end of 2024.

ECC recommend paragraph 11.29 is amended to better reflect the `Smarter Choices Campaign' being provided by the developers at North Broomfield. This covers the whole parish of Broomfield and Blasford Hill, not only the existing village from School Lane northwards.

Reducing the Impact of Traffic

ECC recommend paragraph 11.33 is updated to reflect that the Radial Distributor Road around Beaulieu Park has been completed and is operational.

Map 13 - Suggestions for traffic mitigation (larger scale maps can be found on the Neighbourhood Plan website) proposes several toucan crossings. It should be noted that these can only be implemented where there are cycle routes either side. In addition, any changes to speed limits will need to accord with ECC policy as set out in the ECC Speed Management Strategy.

Community Action CA14 - Strategy to Encourage Sustainable Travel

ECC support the aspirations in CA14 in principle as this approach is consistent with the CFTN Strategy and look forward not working with the parish council on any specific schemes. Encouraging local residents to switch to bus and/or cycle or walk will reduce private cars travelling along the corridor and therefore reduce journey times for buses (encouraging further bus use) and creating a safer and more attractive environment for cyclists (encouraging further cycling uptake).

ECC recommend reference to `cycle paths' is amended to `cycle routes' and `pavements' to `footways' in paragraph 1.

Community Action CA15 - Reducing the Impact of Traffic

ECC notes that paragraph 3 of CA15 makes reference to the provision for a proposed new Hospital Link from Blasford Hill being multipurpose to contribute to improvements to local traffic circulation.

A link to Broomfield Hospital via Strategic Growth Site 8 – North of Broomfield was identified as a requirement within the Chelmsford Local Plan. Broomfield Hospital have not been able to find an agreeable way forward to enable the link road and the developer has now revised the 2 connected applications (20/02064/OUT and 21/00881/FUL) to omit the link road and provide alternative mitigation. ECC recommend paragraph 3 is deleted.

The Council will continue to make the case for the proposed new Hospital Link from Blasford Hill to be multipurpose to better distribute traffic flows in the north of the Parish.

Broomfield Neighbourhood Plan Design Guidelines (April 2020)

ECC notes that the 'Design Guidelines' were published in April 2020 and do not appear to have been updated alongside the Regulation 16 Plan or take into account any subsequent changes in

national and local policy guidance, including the adopted Chelmsford Local Plan, which was adopted in May 2020 and the NPPF.

ECC is not suggesting where amendments should be made but recommend the Design Guidance is reviewed and revised accordingly. Some observations are provided regarding more up to date evidence and policy by relevant section.

National Policy

- National Design Guide (2019)
- National Model Design Code (2021)
- National Planning Policy Framework (December 2023) policy content regarding design and references to specific paragraphs is based upon NPPF (February 2019) and therefore inconsistent with the NPPF (2023).

The NPPF was revised in 2021 (and included in the 2023 version) to implement policy changes in response to the Building Better Building Beautiful Commission "Living with Beauty" report and incorporate the increased focus on design. Paragraph 110 is of particular relevance requiring the design of streets, parking areas, other transport elements and the content of associated standards to reflect current national guidance, including the National Design Guide and the National Model Design Code.

Local Plan Policy

Chelmsford Local Plan 2013-2036 (adopted May 2020) - ECC notes that page 10 states:

As of July 2019, the emerging Plan is found sound by the Planning Inspector subject to main modifications (of which none relates to the allocation in concern). The Plan is scheduled for adoption by the end of 2019.

Consequently, it appears that the guidance has not been updated to be consistent with the Chelmsford Local Plan, which was adopted in May 2020. It is this document that provides the strategic guidance for the NP and its supporting evidence base. NPPF, paragraph 29, footnote 16 states that `Neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area.'

Section 2.3. Green infrastructure and 3.3. Green Infrastructure

The importance of multifunctional green infrastructure (GI) is reinforced by the:

- National Green Infrastructure Framework (January 2023)
 - GI Principles: the why, what and how of good GI.
 - GI Standards: guidance on national standards for GI quantity and quality.
 - GI Maps: mapped environmental, socio-economic datasets to support the standards.
 - GI Planning and Design Guide: practical, evidence-based advice on how to design good quality GI.
 - GI Process Journeys: guides on how to apply all the products in the GI Framework.
- Essex Green Infrastructure Strategy (2020) and the Essex Green Infrastructure Standards (June 2022).

These documents champion for the enhancement, protection, and creation of an inclusive and integrated network of green spaces. Applying Essex's nine GI principles will help to ensure quality and consistency in the provision, management, and stewardship of GI an essential part of placemaking and place-keeping for the benefit of people and wildlife.

2.5. Access and movement

Please refer to ECC comments regarding the Neighbourhood Plan - Travel Strategy - Cycling in the response above and to the Chelmsford City Growth Package - Great Waltham to City Centre Cycle Route.

3.4. Biodiversity and landscape

The Environment Act, 2021, brought mandatory Biodiversity Net Gain (BNG) into law. This means that all new developments will be required to deliver a minimum 10% increase in biodiversity. Essex Local Nature Partnership (ELNP) was set up in response to the Act's requirement for the development of Local Nature Recovery Strategies (LNRS). Its goal is to develop a LNRS that has cross sectoral support, as well as nature recovery, resulting in more nature across Essex in the future, as mandated by the Act. ECC is the 'Responsible Authority' for delivering the Greater Essex Local Nature Recovery Strategy (GELNRS) working closely with the Essex Local Nature Partnership (LNP). The GELNRS is being prepared for completion by Mid-2024. The GELNRS will form the baseline for habitat information, which in turn will generate action to promote biodiversity management and improvement (including identifying strategic opportunity areas) and will provide further useful information.

The ELNP has produced a Biodiversity Net Gain Guidance Pack.

3.8. Permeable and interconnected street network

The EDG - Highways Technical Manual contains the technical information for highways design. It should be read in conjunction with the other sections of the EDG – in particular Streets and Roads and Parking – to provide a full understanding of the relevant design principles for new residential developments. The overarching aim is to ensure that in new residential and mixed-use environments, the circulation and movement of people is pleasant, convenient, safe, responds to local context and combines with good place-making. Motorised vehicle movement must efficiently service development without predominating, while walking, cycling and the use of public transport must be facilitated and encouraged, taking precedence over private modes of motorised transport. Three fundamental objectives stem from this:

- To discourage inappropriate traffic from travelling through residential areas.
- To promote very low driver speeds within residential environments.
- To discourage the use of the private car, particularly for short or local trips.

'In principle' layouts will be developed as part of the planning process, which will include input from the Highways and Transport department at Essex County Council and will reference Manual for Streets as well as ECC guidance. The full access construction details of the site can be finalised with the Highway Authority on this basis.

3.13. Eco design

ECC strongly support developments which seek higher requirements for new homes than the requirement to be in accordance with Building Regulations and go beyond Future Homes Standard (FHS).

ECC has recently published a number of policy and evidence base documents to support emerging Local Plans (and Neighbourhood Plans) and the determination of planning applications, which can be viewed here including:

• Essex Open Legal Advice – Energy policy and Building Regulations (Estelle Dehon KC, Cornerstone Barristers, 25 February 2024)

- Essex Net Zero Policy Study (Reports 1 and 2) (Introba, Etude, Currie & Brown, July 2023)
- 'Net Zero Carbon Viability and Toolkit Study' (Report of Findings August 2022)' prepared by Three Dragons, Qoda and Ward Williams Associates.
- The Planning Policy Position for Net Zero Carbon Development Homes and Buildings in Greater Essex which can be downloaded here.

The Essex Embodied Carbon Study (with funding from the Essex Climate Action Commission) will be published in June 2024 and the 'Planning policy position for net zero carbon homes and buildings in Greater Essex November 2023' subsequently updated.

ECC recommend the supporting text makes reference to the EDG - practical design advice which focusses on how to design developments (of all scales and types) to meet the net zero carbon and energy standards, mitigate potential overheating risk and to address other inter-related sustainability issues. Evidence commissions are underway analysing supply chain and skills development factors and identifying potential opportunities for supporting interventions.

3.15. Rainwater Harvesting

ECC recommends reference is made to the Essex SuDS Design Guide which outlines the drainage hierarchy which requires all surface water runoff to be discharged as high up the following hierarchy as possible:

- Rainwater re-use (rainwater harvesting/greywater recycling)
- An adequate soakaway or other infiltration system
- Hybrid solution of infiltration and discharging to a surface water body
- To a surface water body (e.g. an ordinary watercourse)
- To a surface water sewer, highway drain, or other drainage system
- To a combined sewer.

ECC recommend reference is made to arrangements for SuDS maintenance and their adoption. It is the Lead Local Flood Authority's preference that the drainage network and its accompanying SuDS features are adopted by a public body where possible to ensure lifelong maintenance, and any public body should be engaged early in the design process.

3.16. Housing

Please refer to comments regarding Policy BFD9 – Adaptable Homes to the NP.

3.19. Parking typology and 3.20. Bicycle Parking

The EPOA Essex Parking Standards - Design and Good Practice (2009) are currently being reviewed and can be viewed here. They have been subject to two consultations with LPAs and developers. The standards are being revised to reflect changes in the new Use Class Orders and national planning policy. Different standards are required in different areas based on levels of accessibility, namely town centres (highly accessible); rural (poorly accessible); and other areas (moderately accessible). Details also cover electric vehicle charging requirements for both residential and non-residential uses. More detailed design guidance is also provided for both residential and commercial cycle parking taking account of LTN 1/20 guidance. Once these standards have been approved it is expected that they will be a material consideration to which new development will need to have regard to at an early stage of the design process.

4. Site Analysis

ECC acknowledges that Strategic Growth Site 8 (SGS8) – North Broomfield straddles the boundary between Broomfield and Little Waltham Parishes and references are made to this site in Section 4 – Site Analysis. Chelmsford City Council resolved to grant planning permission subject to conditions and the completion of the Section 106 agreement in June 2023 for up to 512 homes. The allocation is carried over into the Chelmsford Local Plan Review and incorporated into the Preferred Options Local Plan (May/June 2024). ECC has secured the necessary infrastructure and/or contributions to mitigate its impact. The information contained in the Design Guide may well be inconsistent with what has been approved with regards this site, as it is based on the concept framework for the site.

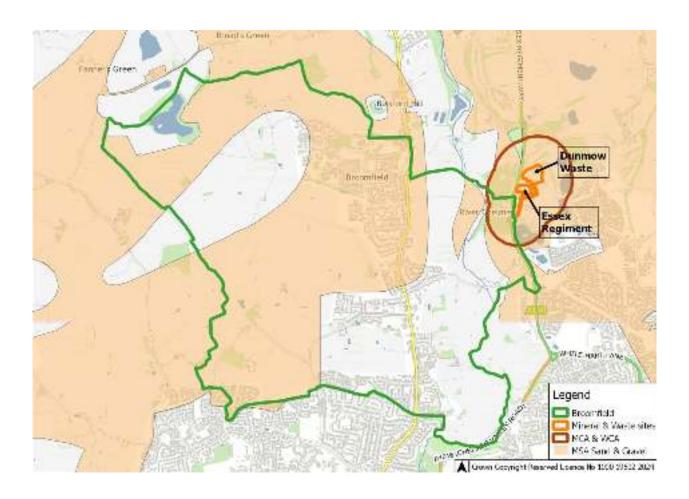
Conclusion

Please contact me if you require further information or would like to discuss this response in more detail.

Yours sincerely,

Kevin Fraser Principal Planning Officer (Spatial Planning)

<u>Appendix 1 – Mineral Safeguarding Area for Sand and Gravel and Waste Sites in the Plan area</u>





Consultee Mr. Abu Reaz Alam (1359599)

Email Address

Address .

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Event Name 4. Broomfield Neighbourhood Plan Reg 16

Consultation

Comment by Mr. Abu Reaz Alam (1359599)

Comment ID BNP-3

Response Date 19/06/24 12:00

Status Processed

Submission Type Web

Version 0.7

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / community action / appendix number below

General

Question 2

Please add your comments below

The population of Chelmsford has increased by 7.8% between 2011 and 2021, keeps continuing to grow and is predicted 11.5% increase by 2041. Proposed developments in Chelmsford need to attract many people of different ethnic, cultural and religious backgrounds. In recent years with many people coming to Chelmsford including many Muslim families requires such community spaces that will fulfil both religious and community facility. At present, having similar facilities in some parts of Chelmsford (City Center and Great Baddow area) there is no such facility in the northern part of Chelmsford. In this proposed development we need to have such sustainable community spaces/infrastructure to be built so that people who are living in north Chelmsford can avail these facilities locally and don't need to travel to the city center or Great Baddow and avoiding traffic congestion in those areas at the same time.

Question 3

Do you wish to be notified of the decision on the Yes Broomfield Neighbourhood Plan?



Consultee Mr Mohammad Muqtadir Samy (1359948)

Email Address

Address

Event Name
4. Broomfield Neighbourhood Plan Reg 16

Consultation

Comment by Mr Mohammad Muqtadir Samy (1359948)

Comment ID BNP-4

Response Date 18/06/24 22:41

Status Processed

Submission Type Web

Version 0.3

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / community action / appendix number below

Question 2

Please add your comments below

There isn't any provision for prayer hall which shows the plan completely ignored the religious and social gathering need of the local community. This is utterly disappointing when there is a significantly increasing Asian community in Chelmsford of which majority are Muslims (ref: https://www.ons.gov.uk/visualisations/censusareachanges/E07000070/). There is a desperate need for a Muslim prayer facility in this area to accommodate the local need.

General

Question 3

Do you wish to be notified of the decision on the Yes Broomfield Neighbourhood Plan?



Consultee Mr K W Fong (1359952)

Email Address

Address

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Event Name 4. Broomfield Neighbourhood Plan Reg 16

Consultation

Comment by Mr K W Fong (1359952)

Comment ID BNP-5

Response Date 18/06/24 22:50

Status Processed

Submission Type Web

Version 0.3

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / community action / appendix number below

Policy BFD10 - Land East of Saxon Way

Question 2

Please add your comments below

See attached file

Question 3

Do you wish to be notified of the decision on the

Broomfield Neighbourhood Plan?

Yes

If you wish to submit any supporting information,

please upload it here

Comments on Broomfield Neighbour Plan.pdf

I am writing to express my strong opposition to the proposed plan to convert Roselawn Farm into an urban area. As a dedicated resident of this community, I deeply value our green spaces and believe this development would be a grave mistake. Here's why we must preserve Roselawn Farm as a green wedge:

Community Health and Well-being:

Instead of urbanizing Roselawn Farm, we should enhance it with cycling tracks, as suggested in the Neighborhood Plan. This would promote active travel, provide a safe space for cyclists. The farm could become a significant park offering recreational activities like walking and cycling, fostering physical and mental well-being. Currently, there are no comparable green facilities nearby, making this a unique and invaluable resource for our community. Urbanizing this space would rob residents of these critical health and wellness benefits.

Historical and Educational Value:

Roselawn Farm is not just a green space; it is a site of historical significance with Anglo-Saxon burial grounds. It offers educational opportunities for local schools and community groups to learn about our history and culture. Further development risks irreversibly damaging these important archaeological sites. Transforming it into an urban zone would mean losing a significant part of our cultural heritage that holds historical and sentimental value for many residents.

Smart Urban Planning and Quality of Life:

Thoughtful urban planning requires balancing development with the preservation of green spaces to enhance the quality of life for all residents. Once green spaces are lost, they are irreplaceable. Chelmsford has other opportunities for urban development that do not compromise our green wedges. The city's adopted local plan includes sizable developments in other parts of Chelmsford, which are more economically effective and sustainable. Prioritizing these areas for growth while protecting our natural environment is the right approach.

Traffic and Infrastructure Concerns:

Broomfield already experiences extreme congestion, especially on the B1008, a major route to Chelmsford City Centre and Broomfield Hospital. The road is at 96% capacity (nearly at full capacity), and further development would worsen traffic, making it difficult for emergency vehicles to navigate. This is a critical issue that urbanizing Roselawn Farm will only exacerbate.

Road Safety and Pollution:

Saxon Way, an unmade road near the farm, already suffers from dust, noise, and pollution due to existing traffic, especially during dry weather. Further development would increase vehicle movement, intensifying these problems and jeopardizing the health and well-being of nearby residents. The road's rough surface and lack of safety measures make it unsuitable for increased traffic. Saxon Way is partly owned by the Council which should take responsibility to pave the road to reduce the air and noise pollution immediately.

Preserving Roselawn Farm as a green wedge is not only about protecting the environment but also about ensuring the well-being and future of our community. I urge you to reject the plan for urban development on Roselawn Farm and consider the long-term interests of our residents and environment.

Thank you for considering my comments. I trust you will make a decision that reflects the best interests of our community and our precious green spaces.



Consultee Ms. S W Chan (1359951)

Email Address

Address

Event Name 4. Broomfield Neighbourhood Plan Reg 16

Consultation

Comment by Ms. S W Chan (1359951)

Comment ID BNP-6

Response Date 18/06/24 22:52

Status Processed

Submission Type Web

Version 0.2

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / community action / appendix number below

Policy BFD10 - Land East of Saxon Way

Question 2

Please add your comments below

Please see attached for comments

Question 3

Do you wish to be notified of the decision on the

Broomfield Neighbourhood Plan?

Yes

If you wish to submit any supporting information,

please upload it here

Broomfield Neighbourhood plan comment.pdf

Dear Sir/ Madam,

After reading the Broomfield Neighbourhood Plan, I am writing to express my deep concern regarding the proposal to convert the Roselawn farm located within our green wedge into an urban area. As a local resident who cherishes the unique environmental and community benefits that our green spaces provide, I do not agree with the plan to urbanize Roselawn Farm. Here are several key points that highlight the importance of preserving the farm as a green wedge:

1. Main Road General Traffic Issues:

Broomfield sits astride the B1008, which is classed as a Principal Route One (PR1) - a major route into Chelmsford City Centre from the north. It also forms the only road access to Broomfield Hospital, the City's general hospital and largest employer. The B1008 is therefore a key route for emergency vehicles. The result is extreme congestion at peak times. The B1008 is at 96% at capacity, one of the most congested routes in Chelmsford. Therefore, there is no point to further develop the farm into an urban area that would induce more traffic going back and forth along the Main Road and worsen the traffic congestion.

2. Road condition of Saxon Way

Saxon way is an unmade road. With the activities carried out inside the farm, the vehicle travels back and forth has created lots of dust and noise round the clock and this jeopardizes resident peace, wellness and health.Indeed, in the Broomfield neighbourhood plan, no assessment has been conducted to understand the environmental impact to the residents by these pollutants. Further development happening inside the farm will intensify the traffic flow along Saxon way. Considering access along Saxon way, the unmade road situation of Saxon Way is unsafe and unsuitable for taking more vehicles due to its rough surface and no proper road safety measure to reduce the speed in place, this will make the pollution situations and traffic safety more worse and affect the living quality and well-being of the residents living nearby.

3. Urban Planning and Quality of Life:

Thoughtful urban planning involves balancing development with the preservation of green spaces to enhance the quality of life for all residents. Once green spaces are lost, they are irreplaceable. The city has other opportunities for urban development that do not compromise our green wedges. Instead, in the latest Chelmsford City adopted local plan, Spatial Strategy sets out the scale and distribution of new development across Chelmsford. There are areas with sizable plans in new homes, office parks, retail parks in other parts of Chelmsford to meet the identified development needs. They are sizable developments which are more economically effective and it is more worthwhile to prioritize sustainable growth that includes the protection of our natural environment.

4. Community Health and Well-being:

Instead of urbanizing the Roselawn Farm, I would support the plan in providing cycling tracks as stated in the Neighbour Plan. This approach aligns with the nationwide direction of promoting active travel. This also provides a safe track for the cyclists to travel and minimize the traffic accidents. This farm is an ideal place offering spaces for a sizable recreational

activities like hiking, cycling, and picnicking, promoting physical activity and mental well-being that currently there is not such green facilities available nearby. It is a serene environment for residents to connect with nature, enjoy recreational activities, and foster a sense of community. Urbanizing this space would deprive residents of these invaluable health and wellness benefits.

5. Historical and Educational Value:

The farm is not just a green space; it is also a place of historically important Anglo-Saxon burial. It offers educational opportunities for local schools and community groups to learn about history and culture. The Roselawn farm has the Saxon burial grounds necessitats archaeological investigation which is of national significance. Further development will put a risk in damaging the burial site that is irreversible once it is damaged. Transforming it into an urban zone would mean losing a significant part of our cultural landscape that has historical and sentimental value to many residents.

6. Environmental Sustainability:

The green wedge is a vital green lung for our city, helping to mitigate air pollution and reduce urban heat island effects. It plays a crucial role in maintaining local biodiversity by providing habitat for various species of flora and fauna. Converting this area into urban land would result in significant environmental degradation, loss of wildlife habitat, and decreased air quality.

7. Climate Change Mitigation:

Green wedges act as carbon sinks, absorbing CO2 and other greenhouse gases. In an era where climate change poses a severe threat, maintaining such green spaces is essential for our city's climate resilience. Urban development on this farm would contribute to increased carbon emissions and further exacerbate climate-related challenges. Green wedges also help in managing water resources, reducing runoff, and maintaining groundwater levels.

I believe that preserving the Roselawn farm as a green wedge is not just a matter of environmental protection but also a commitment to the well-being and future of our community. I strongly disagree with the plan for an urban development inside the Roselawn Farm.

Thank you for considering my comments. I trust that you will make a decision that reflects the long-term interests of our community and the environment.



Consultee Dr Mohammad Kabir (1359598)

Email Address

Company / Organisation

Essex Muslim Centre

Address

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Event Name

4. Broomfield Neighbourhood Plan Reg 16

Consultation

Comment by

Essex Muslim Centre (Dr Mohammad Kabir

-1359598)

Comment ID
BNP-7

Response Date 18/06/24 23:07

Status Processed

Submission Type
Web

Version

0.3 Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / General community action / appendix number below

Question 2

Please add your comments below

Chelmsford has been very popular in recent year's among the commuters. Post covid we have seen significant influx of population in Chelmsford. The new developments in Chelmsford will attract many more with different cultural, ethnic and religious backgrounds. We can see the effect of increasing Muslim population in Chelmsford, on existing religious facilities. There is one mosque and a leisure centre converted to Muslim prayer facilities, both are struggling to accommodate number of attendees. It is causing a lot of issues with traffic and to the neighbours. As a result, Essex Muslim centre proving alternative prayer facilities using Church Hall. That facilities is also over-subscribed. We need to build sustainable community and religious facilities for religious, muslims population, specially in North of Chelmsford away from busy roads or junctions. Essex Muslim centre is very keen to see these points are taken seriously in the planning and designing of the future infrastructure and developments in Chelmsford.

Question 3

Do you wish to be notified of the decision on the Broomfield Neighbourhood Plan?	Yes



Consultee Mr Chanchal Khan (1359955)

Email Address

Address

4. Broomfield Neighbourhood Plan Reg 16

Event Name Consultation

Mr Chanchal Khan (1359955)

Comment by
BNP-8

Comment ID

18/06/24 23:20 **Response Date**

Status

Web

Submission Type 0.4

Version

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / community action / appendix number below

General

Processed

Question 2

Please add your comments below

The population is growing in Chelmsford, and this will provide a safe space for members of the community. Despite weekly prayers arranged by Essex Muslim Centre at Springfield Parish Council, facilities are at full capacity which means that it is difficult to accommodate everyone when parking. Having a new space will allow members to focus on mental health, social care and physical activity in order to contribute further to the local community.

Question 3

Do you wish to be notified of the decision on the Yes Broomfield Neighbourhood Plan?



Consultee Mr Md Taifur Ripon (1360009).

Email Address .

Address .

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Event Name 4. Broomfield Neighbourhood Plan Reg 16

Consultation

Comment by Mr Md Taifur Ripon (1360009)

Comment ID BNP-9

Response Date 19/06/24 10:31

Status Processed

Submission Type Web

Version 0.2

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / community action / appendix number below

General

Question 2

Please add your comments below

We moved to chelmsford last October 2023 and loved the area where we lived in and all Chelmsford area, also loved the plan you made before .

As a Muslim we are struggle to go prayer in Friday and 2 Eid as number of Muslims increasing significantly and will continue increase, i would like to thank you and local gov and central gov for your policy you taken.

when we go for Eid or Ramadan or friday prayer , we care fully parking in parking spot , but always oversubscribed .

if we get a place in new development would help to reduce pressure on central Chelmsford .

Question 3

Do you wish to be notified of the decision on the Yes Broomfield Neighbourhood Plan?



Consultee Mr Mohammad Bari (1360008)

Email Address .

Company / Organisation Essex Muslim Centre

Address .

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Event Name 4. Broomfield Neighbourhood Plan Reg 16

Consultation

Comment by Essex Muslim Centre (Mr Mohammad Bari

-1360008)

Comment ID BNP-10

Response Date 19/06/24 10:44

Status Processed

Submission Type Web

Version 0.2

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / community action / appendix number below

General

Question 2

Please add your comments below

Chelmsford is becoming more ethnically diverse, with a fast-growing Muslim population that is putting pressure on local services like mosques, schools, and community centres. Muslims are the second largest religious group in Chelmsford, and their percentage of practising members is higher than any other. Most services are concentrated in the city centre, but there is a need for more facilities in the North of Chelmsford. As an executive member of Essex Muslim Centre, we have helped start a prayer and gathering facility in Springfield's parish council to ease the load on the two existing mosques, but it is often full. A larger centre in the North is needed to provide for daily prayers, Friday prayers, Eid celebrations, and Ramadan prayers. This centre should also offer fitness classes, mental health support, and activities for the elderly to help Muslims engage with the community. Educating young people about religious values and respect for other religions is crucial to preventing extremism. A designated area for prayer, education, physical activities, and social support is essential for the community's well-being and integration with local services.

Question 3

Do you wish to be notified of the decision on the Broomfield Neighbourhood Plan?	Yes



Consultee Mr Hasan Chowdhury (1359994)

Email Address

Address

.

Event Name 4. Broomfield Neighbourhood Plan Reg 16

Consultation

Comment by Mr Hasan Chowdhury (1359994)

Comment ID BNP-11

Response Date 19/06/24 11:27

Status Processed

Submission Type Web

Version 0.3

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / community action / appendix number below

General

Question 2

Please add your comments below

Chelmsford is becoming more and more popular to people who are in search of a place that can provide better amenities, accommodation, education, facilities to have a healthy life, transport link to & from other cities and so on & so forth. This beautiful vibrant city of Essex and all its infrastructures and facilities as mentioned above have led to a sharp increase in population over the last few years. Of the total population of 110,606 as per 2021 census, Muslim community accounts for the second highest after Christian with almost 800 families and this number is expected to increase rapidly in the coming days, months and years. The unity in the Muslim community here in Chelmsford is incredibly strong and each member is working collaboratively and tirelessly every day to fulfil the needs of this booming community. However not everything is in the hand of community people and they are badly in need of the support from local government / council to ensure there is sufficient infrastructures, places and facilities available to accommodate this growing community. To my observation the following points will provide a clear picture of what is currently in place versus requirements in just North Springfield area.

1. Currently prayers and social gathering are being organised by an organisation called 'Essex Muslim Centre' only once in every week in parish council, Springfield but it reached to its full capacity and undoubtedly they need a bigger place to provide all the facilities that Muslim community need in that area. These includes prayer facilities like daily prayers, Friday prayers, Eid festival, Ramadan prayers,

religious education etc.

- 2. Also, facilities like physical activity and fitness classes, mental health support, elderly support, which will encourage Muslim to engage with local community and break the barriers in social interactions.
- 3. In addition, Muslim women are currently unable to go to gym, swimming or any indoor or outdoor physical activities due to social / cultural barriers. We need facilities where they can enjoy all these without any reservation or having to compromise with their religious values.
- 4. Moreover, in order to boost the values and morals among young generation they need a well-equipped permanent place to educate themselves and understand their religion better as well as the importance of other religion in British society and to prevent any extremism, terrorism etc on British soil.
- 5. As the current situation stands, Muslim community in North Springfield need a designated place / facilities to provide prayers & educational facilities, physical, social and cultural activities to support mental health, social care and NHS services.

Therefore my urge to relevant authority will be to take into consideration all the above in the process of planning and designing all future infrastructure & development projects in Chelmsford and simultaneously support organisations like Essex Muslim Centre in achieving its goals of building a permanent bigger place which would be easily accessible and would provide all those facilities which the community people are badly in need of.

Question 3

Do you wish to be notified of the decision on the Yes Broomfield Neighbourhood Plan?



Consultee Dr Hossain Hadi (1359930)

Email Address .

Company / Organisation Essex Muslim Centre

Address .

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Event Name 4. Broomfield Neighbourhood Plan Reg 16

Consultation

Comment by Essex Muslim Centre (Dr Hossain Hadi - 1359930)

Comment ID BNP-12

Response Date 19/06/24 11:55

Status Processed

Submission Type Web

Version 0.4

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / community action / appendix number below

General

Question 2

Please add your comments below

As an active member and organiser for the Essex Muslim Center, I am pleased to advocate for the future needs of the Muslim community in Chelmsford as part of the Council's review of the adopted local plan extending to 2041. We take pride in being British Muslims, enjoying the constitutional right to freely practice our religion. However, there is a significant lack of facilities for Muslims to engage in fundamental worship, which has led to confusion and misunderstandings within the community due to the limited current facilities in Chelmsford South.

The Essex Muslim Center is eager to develop a community center in North Chelmsford to provide a space for Muslims to observe religious duties such as Friday prayers, Eid prayers, and nightly prayers during Ramadan. We propose the establishment of a center that can accommodate 300-400 people for these congregational activities. Additionally, this center should offer facilities for religious education, social activities, mental health support, women's exercise clubs, and physical activities, promoting health awareness and targeting ethnic and gender-specific needs.

We recognize the unique needs of Muslim women who face social and cultural barriers preventing them from accessing gyms, swimming pools, or other physical activities. Therefore, we seek facilities where they can participate in these activities without fear or reservation. Furthermore, we aim to educate the younger generation about moral values, the importance of understanding different religions, and the significance of British society and politics. Proper religious education is essential to prevent extremist activities on British soil.

To support all the above needs, we need designated areas for prayer, educational, physical, social, and cultural activities. We hope the review plan will address these needs, particularly in North Chelmsford, an area with growing numbers of Muslim population. A suitable location with ample parking and surrounding green spaces is essential to accommodate our community, especially during peak times.

We look forward to collaborating with the Council to ensure these needs are met and hope our proposals will be actively considered.

Question 3



Consultee Mr Md Moududur Rahman (1360073)

Email Address

Address

4. Broomfield Neighbourhood Plan Reg 16

Event Name Consultation

Mr Md Moududur Rahman (1360073)

Comment by
BNP-13

Comment ID 19/06/24 12:30

Response Date Processed

Status

Web

Submission Type 0.4

Version

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / community action / appendix number below

General

Question 2

Please add your comments below

I am resident of chelmsford since 2009, witnessed the massive development and influx of people specially Asian and muslim community from various race attracted by easy London commuting facility and brilliant Grammar schools. This is affecting the current traffic and increasing demand of religious facilities which is inadequate at the moment. As a working form home individual, I am struggling to travel from North to South Chelmsford for religious activity.

As an active member of the Essex muslim centre, I am expressing my concern about the insufficient worship facility with in the North Chelmsford area. This is my humble request to register this concern and facilitate something for us and our future generation.

Question 3



Consultee Mr Jahir Uddin (1360070)

Email Address .

Address .

.

Event Name 4. Broomfield Neighbourhood Plan Reg 16

Consultation

Comment by Mr Jahir Uddin (1360070)

Comment ID BNP-14

Response Date 19/06/24 12:18

Status Processed

Submission Type Web

Version 0.4

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / community action / appendix number below

General

Question 2

Please add your comments below

I wanted to highlight the urgent need for enhanced community facilities in Chelmsford to support our growing and diverse population which is missing in proposed policy.

Growing Population: Chelmsford's population is increasing, and new developments will attract more people from diverse backgrounds. There has been a significant influx of Muslims, impacting existing facilities such as mosques, faith centers, schools, and other community services.

Current Challenges: There are no prayer facilities in the North of Chelmsford, There is Prayers and social gathering currently organised in the Parish Council by EMC(Essex Muslim Centre), Springfield, but this venue is nearly full every week.

Need for a Bigger Center: We require a larger centre to accommodate the needs of the Muslim community, including facilities for daily prayers, Friday prayers, Eid festivals, and Ramadan prayers. Comprehensive Facilities: The centre should also offer physical activity and fitness classes, mental health support, and elderly support to encourage Muslim engagement with the local community and break down social barriers.

Facilities for Muslim Women: Muslim women often avoid gyms, swimming pools, and other physical activities due to social and cultural barriers. We need dedicated facilities where they can participate without fear or reservation.

Education and Prevention: Educating the younger generation about values and morals is crucial so

they understand their religion and the importance of other religions in British society. Proper religious education is necessary to prevent extremism and terrorist activities.

Designated Area for Muslims:We urgently need a designated area for Muslims that provides prayer facilities, educational opportunities, physical activities, and social and cultural activities to support mental health, social care, and NHS services.

Providing these facilities is essential for fostering a cohesive and inclusive community in Chelmsford, ensuring all residents, regardless of their religious background, have access to the services and support they need.

I really hope you will consider these points and reflect a plan to impact my concerns raised as above. Thank you

Question 3



Consultee Mr Mohammad Hasan Murad (1360022)

Email Address .

Address

.

4. Broomfield Neighbourhood Plan Reg 16

Event Name Consultation

Mr Mohammad Hasan Murad (1360022)

Comment by BNP-15

Comment ID 19/06/24 12:24

Response Date

Processed

Status

Web **Submission Type**

0.6

Version

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / community action / appendix number below

Community Action CA12 - Meeting the need for new community facilities

Question 2

Please add your comments below

Chelmsford city has been expanding dramatically interms of population and other development activities and becoming very popular destination in recent years among the commuters. The new development projects will definitely attract huge number of people with different cultural, ethnic and religious backgrounds. As a result there is already and will be more effect (due to increasing Muslim population in Chelmsfordon) on existing religious facilities. At this moment for Muslim community there is one mosque and a leisure centre partly converted to Muslim prayer facilities along with other social activities which are really struggling to accommodate the Muslim attendees. Causing lots of issues in terms of carpark, traffic and to the neighbours. Due to this Essex Muslim centre providing alternative prayer facilities using Church Hall which is already overvrcrowded. For ever increasing muslim population we urge the planning authority to take this into consideration hence the need to build sustainable, bigger community and religious facilities for religious muslims population, specially in North of Chelmsford avoiding busy roads or junctions. Which will allow muslim community to engage with various social activisties (i.e elders club, gym class, mental health supports facilities etc) with the broader society along side with prayer facilities. We as muslim community along side with Essex Muslim centre will really appreciate if the planning authority gives a keen interest to these points and takes a serious consideration in the planning and designing the future infrastructure and developments in Chelmsford.

Question 3



Consultee Mohammed Rahman (1360109)

Email Address

Address .

.

Event Name 4. Broomfield Neighbourhood Plan Reg 16

Consultation

Comment by Mohammed Rahman (1360109)

Comment ID BNP-18

Response Date 19/06/24 13:28

Status Processed

Submission Type Web

Version 0.4

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / community action / appendix number below

General

Question 2

Please add your comments below

I am writing to provide suggestions regarding the proposed development project in Chelmsford. While I acknowledge the potential benefits of new developments, such as increased housing availability and economic growth, there are several critical issues that I believe need to be addressed to ensure the project benefits the community especially the ethnic minority people. In recent years many people have been moving to Chelmsford from different parts of the country. The effect of this influx is clearly visible on the existing facilities in Chelmsford like mosques, faith center, school and other community services. It is important they are engaged with social and community building, aware of health and wellness, social interaction and helping to build a more connected and supportive community. We need more facilities in north Chelmsford so that the increased population living here will benefit from it in years to come.

Question 3



Agent Mohammad Islam (1360112)

Email Address

Address

Consultee . .

Email Address

Comment by

Address

.

.4. Broomfield Neighbourhood Plan Reg

Mohammad Islam (1360117)

Event Name 16 Consultation

Comment ID BNP-19

Response Date 19/06/24 13:35

Status

Processed

Submission Type Web

Version 0.5

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / community action / appendix number below

General

Question 2

Please add your comments below

As a resident of Chelmsford, I would like to express my views on the proposed development aimed at better serving the whole community in our town. This initiative is a positive step towards ensuring that all community members including ethnic minorities have access to the facilities and services they need to thrive. Here are several reasons why this proposal is beneficial for people of north Chelmsford, Social and Community Support: Dedicated infrastructure can serve as a hub for social interaction and community support, fostering stronger bonds within the Muslim community and with the wider Chelmsford population. This will include facilities for social events, educational programs, daily prayers including Friday gatherings and youth activities.

Economic Benefits: Infrastructure development can lead to economic growth by attracting new businesses and creating jobs. Halal markets, restaurants, and other services can cater to both Muslim and non-Muslim residents, contributing to the local economy.

Collaboration with Other Organizations: Partnering with other community organizations and local authorities can enhance the center's offerings and ensure it is a well-integrated part of Chelmsford's social fabric.

Inclusivity: While the primary focus is on serving the Muslim community, the community center/hub should also encourage participation from non-Muslims in certain events and programs to foster greater understanding and unity.

In conclusion, the proposed infrastructure development in north Chelmsford is a significant step towards creating a more inclusive, supportive, and vibrant community. By addressing the specific needs of the Muslim community, this initiative will contribute to the overall well-being and cohesion of our town. I strongly suggest that any future proposal focuses on the above issues, and I look forward to seeing its positive impact on Chelmsford.

Question 3



Consultee Mr MOHAMMAD TANVIR AHMAD

Email Address (1360115)

Address

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Event Name 4. Broomfield Neighbourhood Plan Reg 16

Consultation

Comment by

Mr MOHAMMAD TANVIR AHMAD (1360115)

Comment ID
BNP-20

Response Date 19/06/24 13:51

Status

Processed

Submission Type

Web

Version

0.5

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / community action / appendix number below

General / CA12

Question 2

Please add your comments below

- 1. Based on Chelmsford's extension plan and the growing population in the northern part of the city, several upgrades and additions are necessary. Although the train station project is progressing well, it is recommended to build a couple of new schools, a community and sports center, and spaces for religious purposes to meet the needs of the expanding community.
- 2. I am eager to see a Muslim prayer facility in the new build area, as the existing mosque in Chelmsford is too far away, making it difficult to attend. Despite this, I am still considering moving to the new area, though the lack of such facilities is inconvenient.
- 3. Transportation from the new development to the train station needs to be more frequent and provide shorter journey times to facilitate commuting to London for work.

Question 3



Consultee Mr Bibi Afrose (1360203)

Email Address .

Address

.

Event Name 4. Broomfield Neighbourhood Plan Reg 16

Consultation

Comment by Mr Bibi Afrose (1360203)

Comment ID BNP-21

Response Date 19/06/24 14:45

Status Processed

Submission Type Web

Version 0.5

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / community action / appendix number below

General

Question 2

Please add your comments below

Chelmsford has become very popular in recent years among commuters. The new developments in Chelmsford are expected to attract a more diverse population with various cultural, ethnic, and religious backgrounds. The increasing Muslim population in Chelmsford is already impacting existing religious facilities. Currently, there is one mosque and a leisure centre that has been converted to Muslim prayer facilities, both of which are struggling to accommodate the number of attendees. This situation is causing significant traffic issues and inconvenience to the neighbours.

In response, the Essex Muslim Centre has been providing alternative prayer facilities using a Church Hall, but this facility is also over-subscribed. To build a sustainable community and accommodate the religious needs of the Muslim population, especially in the northern part of Chelmsford away from busy roads or junctions, it is essential to plan and design future infrastructure and developments with these needs in mind. The Essex Muslim Centre is very keen to see these points taken seriously.

Question 3



Consultee Mr Michael Priaulx (1360192)

Email Address swifts.planning@gmail.com

Company / Organisation Swifts Local Network: Swifts & Planning Group

Address

4. Broomfield Neighbourhood Plan Reg 16

Event Name Consultation

Swifts Local Network: Swifts & Planning Group (Mr

Comment by Michael Priaulx - 1360192)

BNP-22

Comment ID 19/06/24 15:19

Response Date

Processed

Status

Web Submission Type

0.3

Version

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / community action / appendix number below

6. The Natural Environment

Question 2

Please add your comments below

The Natural Environment section is welcome, but it does not consider endangered urban wildlife such as red-listed bird species which inhabit buildings,

nor propose biodiversity enhancement integrated into the buildings of new development, e.g. swift bricks, bat boxes and hedgehog highways.

Such species features are excluded from the national Biodiversity Net Gain metric.

In summary, therefore please add to the policy:

Swift bricks to be installed in new developments including extensions, in accordance with best practice guidance such as BS 42021 or CIEEM. Artificial nest cups for house martins may be proposed instead of swift bricks where recommended by an ecologist. Bat boxes and hedgehog highways to also be included where appropriate.

In more detail:

The reason for this is that bird boxes/ bricks and other species features are excluded from the DEFRA Biodiversity Net Gain metric, so require their own clear policy.

The Government's response in March 2023 to the 2022 BNG consultation stated that: "We plan to

keep species features, like bat and bird boxes, outside the scope of the biodiversity metric... [and] allow local planning authorities to consider what conditions in relation to those features may be appropriate" (page 27, https://consult.defra.gov.uk/defra-net-gain-consultation-team/technicalconsultation biodiversitymetric/).

Swift bricks are the only type of bird box specifically mentioned as valuable to wildlife in national planning guidance, along with bat boxes and hedgehog highways (NPPG Natural Environment 2019 paragraph 023). The National Model Design Code Part 2 Guidance Notes (2021) also recommends bird bricks (Integrating Habitats section on page 25, and Creating Habitats section on page 26). Swift bricks are considered a universal nest brick suitable for a wide range of small bird species including swifts, house sparrows and starlings (e.g. see NHBC Foundation: Biodiversity in New Housing Developments (April 2021) Section 8.1 Nest sites for birds, page 42:

https://www.nhbcfoundation.org/wp-content/uploads/2021/05/S067-NF89-

Biodiversity-in-new-housing-developments FINAL.pdf).

Swift bricks are significantly more beneficial than external bird boxes as they are a permanent feature of the building, have zero maintenance requirements, are aesthetically integrated with the design of the building, and have improved thermal regulation with future climate change in mind.

Therefore, swift bricks should be included in all developments following best-practice guidance (which is available in BS 42021:2022 and from CIEEM

(https://cieem.net/resource/the-swift-a-bird-you-need-to-help/)).

Natural England consider species features like swift bricks a building block of green infrastructure (e.g. see the table here: https://naturalengland.blog.gov.uk/2023/11/08/green-infrastructure-creating-habitable-towns-and-cities-fit-for-the-future/)

but this is not well known and therefore needs a clear policy.

The UK Green Building Council (UKGBC) is a membership-led industry network and they have produced a document entitled: "The Nature Recovery & Climate Resilience Playbook" (Version 1.0, November 2022) https://ukgbc.org/resources/the-nature-

recovery-and-climate-resilience-playbook/ This document is designed to empower local authorities and planning officers to enhance climate resilience and better protect nature across their local area, and includes a recommendation (page 77) which reflects guidance throughout this document: "Recommendation: Local planning Authorities should introduce standard planning conditions and policies to deliver low cost/no regret biodiversity enhancement measures in new development as appropriate, such as bee bricks, swift boxes [and bricks] and hedgehog highways."

In addition to Neighbourhood Plans, many Local Authorities are including detailed swift brick requirements in their Local Plan, such as Wiltshire Local Plan Regulation 19 stage, which requires an enhanced number of 2 swift bricks per dwelling (policy 88: Biodiversity in the built environment, page 246 - "As a minimum, the following are required within new proposals: 1. integrate integral bird nest bricks (e.g. swift bricks) at a minimum of two per dwelling;"

https://www.wiltshire.gov.uk/article/8048/Current-

consultation-Reg-19),

and Cotswold District Council are proposing three swift bricks per dwelling in their current Local Plan consultation (Policy EN8 item 6, and paragraph 0.8.4,

https://www.cotswold.gov.uk/planning-and-building/planning-policy/local-plan-update-and-supporting-information/),

so such an enhanced level should also be considered.

Also:

Please add to the Neighbourhood Plan: Existing nest sites for building-dependent species such as swifts and house martins should be protected, as these endangered red-listed species which are present but declining in the parish return annually to traditional nest sites. Mitigation should be provided if these nest sites cannot be protected.

Question 3



Consultee Chelmsford City Council (1252951)

Email Address planning.policy@chelmsford.gov.uk

Company / Organisation Chelmsford City Council

Address Civic Centre

Duke Street Chelmsford CM1 1JE

Event Name 4. Broomfield Neighbourhood Plan Reg 16

Consultation

Comment by Chelmsford City Council (Chelmsford City Council -

1252951)

Comment ID BNP-23

Response Date 19/06/24 15:20

Status Processed

Submission Type Web

Version 0.3

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / community action / appendix number below

Para 2.14

Question 2

Please add your comments below

The NPPF has been further updated, therefore suggest updating NPPF date to December 2023.

Question 3



Consultee Chelmsford City Council (1252951)

Email Address planning.policy@chelmsford.gov.uk

Company / Organisation Chelmsford City Council

Address Civic Centre

Duke Street Chelmsford CM1 1JE

Event Name 4. Broomfield Neighbourhood Plan Reg 16

Consultation

Comment by Chelmsford City Council (Chelmsford City Council -

1252951)

Comment ID BNP-24

Response Date 19/06/24 15:21

Status Processed

Submission Type Web

Version 0.3

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / community action / appendix number below

Para 3.15

Question 2

Please add your comments below

The new parish council mentioned has been created, but the population figures are not yet available. We suggest the first 3 sentences of 3.15 are amended as follows:

Until recently, Broomfield Parish had a population of approximately 6,400 residents. Recent population growth has been focused on development extending north from the urban area of Chelmsford and Beaulieu Park. With the creation in 2023 of a new Chelmsford Garden Community Council, the population of Broomfield is expected to fall to about 4,000.

Question 3



Consultee Chelmsford City Council (1252951)

Email Address planning.policy@chelmsford.gov.uk

Company / Organisation Chelmsford City Council

Address Civic Centre

Duke Street Chelmsford CM1 1JE

Event Name 4. Broomfield Neighbourhood Plan Reg 16

Consultation

Comment by Chelmsford City Council (Chelmsford City Council -

1252951)

Comment ID BNP-25

Response Date 19/06/24 15:24

Status Processed

Submission Type Web

Version 0.2

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / community action / appendix number below

Para 4.4

Question 2

Please add your comments below

It is anticipated that the Local Plan will be adopted in late 2025/early 2026, therefore we suggest updating the text.

Question 3



Consultee Chelmsford City Council (1252951)

Email Address planning.policy@chelmsford.gov.uk

Company / Organisation Chelmsford City Council

Address Civic Centre

Duke Street Chelmsford CM1 1JE

Event Name 4. Broomfield Neighbourhood Plan Reg 16

Consultation

Comment by Chelmsford City Council (Chelmsford City Council -

1252951)

Comment ID BNP-26

Response Date 19/06/24 15:25

Status Processed

Submission Type Web

Version 0.2

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / community action / appendix number below

Policy BFD8

Question 2

Please add your comments below

We suggest that Policy BFD8 – Housing Mix and, as a consequence, paragraphs 7.14 and 7.15 are amended/deleted, for the following reasons:

Para 7.14 says that Policy BFD8 will 'supplement' Local Plan Policy DM1.

The overriding policy considerations should be the indicative market mix requirements of Policy DM1 and the priority affordable housing needs of the City Council as set out in Section 5 of the Planning Obligations SPD (https://www.chelmsford.gov.uk/media/gzrfz1wm/planning-obligations-spd.pdf) and the Chelmsford Housing Strategy 2022 – 2027

(https://www.chelmsford.gov.uk/media/fzeis02v/chelmsford-housing-strategy-2022-to-2027.pdf). DM1 and BFD8 are therefore in conflict.

This point was made in the CCC informal response to an earlier draft plan in April 2022, and again to the Regulation 14 Consultation (partially repeated below):

'LP Policy DM1 sets out the indicative market mix as derived from the Strategic Housing Market Assessment. It is evidence base led and will be reviewed in the new Strategic Housing Needs

Assessment / review of the Local Plan. A separate housing mix is also required for the affordable housing for rent – as summarised in the Planning Obligations SPD. Once again this is evidence base led and calculated using a different methodology to the market mix.

Results of the residents' survey is not strong enough to provide evidence for a departure from LP policy. Your specific allocation can be used to focus on needs that you identify through the Housing Needs Assessment, but it cannot be applied as a general policy for all development as it conflicts with the Local Plan. The proposed housing mix may also be in conflict with your aspirations for Land East of Saxon Way and have unintended consequences.'

The Local Plan site allocation policy for Strategic Growth Site 8 – North of Broomfield – includes a requirement for homes of a mixed size and type, with qualification at Para 7.289 that housing should be provided in accordance with the Council's policy requirements. This site is allocated to meet the wider needs of the Council's area. This site cannot therefore be required to meet the criteria in Policy BFD8, and the two are in conflict.

BFD8 also says that the mix should be provided across all tenures, but as mentioned there is a separate mix for affordable housing for rent (Table 3 of the Planning Obligations SPD), so it would not be expected that Policy BFD8 should apply across all tenures.

There is no indication of how a development of 10 or more dwellings would be restricted to existing Broomfield residents (which would be unlikely particularly for the 65% of market homes) so an alternative mix would not therefore be meeting the needs of Broomfield parish.



Consultee Chelmsford City Council (1252951)

Email Address planning.policy@chelmsford.gov.uk

Company / Organisation Chelmsford City Council

Address Civic Centre

Duke Street Chelmsford CM1 1JE

Event Name 4. Broomfield Neighbourhood Plan Reg 16

Consultation

Comment by Chelmsford City Council (Chelmsford City Council -

1252951)

Comment ID BNP-27

Response Date 19/06/24 15:27

Status Processed

Submission Type Web

Version 0.2

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / community action / appendix number below

Policy BFD10

Question 2

Please add your comments below

Any planning applications for this site would be assessed against Policy BFD10, and so it is advised that the policy includes all the required elements to ensure development is deliverable and sustainable. Given that 1.25ha could generate a development of 25 to 30 dwellings, this would be considered as major development. This may generate a need for various infrastructure contributions, which should be included within the policy.

We suggest including additional wording as follows:

Site infrastructure requirements:

- Financial contributions to early years, primary and secondary education provision as required by the Local Education Authority, and other community facilities such as healthcare provision as required by the NHS Mid and South Essex Integrated Care Board;
- Financial contributions to new or enhanced sport, leisure and recreation facilities;
- Appropriate improvements, as necessary, to the local and strategic road network as required by the Local Highways and Transportation Authority

Items that this site should particularly provide/enable should also be stated in the policy rather than contained only in the accompanying text. Showing the boundary planting on the concept diagram may not be enough to secure it when it comes to a planning application, so it would be better to include it in the policy, along with the Green Wedge, landscape, SuDS, amenity, archaeology, and cycle path requirements. BFD14 does provide good examples of this approach.

It would also be helpful to state the location of the main access. We suggest including additional wording as follows:

Main vehicle and pedestrian access would be from Saxon Way.

Further clarification may be necessary relating to whether the housing and the surgery could come forward together, or whether they are alternatives. The policy does indicate that the housing would only come forward if the remainder of the site is for community open space; if so, the bullets for the uses could be re-ordered as follows:

- community affordable housing to meet the specific needs of local people in Broomfield; or
- a GP surgery should the Mid and South Essex Integrated Care Board provide evidence that the surgery is required and deliverable at the time a planning application for the development is submitted; and
- community open space, cycle paths and footpaths.



Consultee Abu Akanda (1360084)

Email Address

Address

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Event Name 4. Broomfield Neighbourhood Plan Reg 16

Consultation

Comment by Abu Akanda (1360084)

Comment ID BNP-28

Response Date 19/06/24 12:31

Status Processed

Submission Type Web

Version 0.4

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / community action / appendix number below

General

Question 2

Please add your comments below

I m Muslim & living Springfield. We need a mosque & muslim community centre

Question 3

Do you wish to be notified of the decision on the Broomfield Neighbourhood Plan?

Yes



Consultee Shamsul Hoque (1338584)

Email Address PlanningEE@NationalHighways.co.uk

Company / Organisation National Highways

Address Spatial Planning operations (East)

Woodlands Bedford MK41 7LW

Event Name 4. Broomfield Neighbourhood Plan Reg 16

Consultation

Comment by National Highways (Shamsul Hoque - 1338584)

Comment ID BNP-29

Response Date 19/06/24 16:20

Status Processed

Submission Type Email

Version 0.8

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / community action / appendix number below

1.4 Vision Statement

Question 2

Please add your comments below

Vision Statement: We support the principles for the proposed Vision Statement and Objectives, which are presented in the document.

See attached letter for more detail.

Yes

Question 3

Do you wish to be notified of the decision on the

Broomfield Neighbourhood Plan?

If you wish to submit any supporting information, BNP-29 National Highways - Attachment.pdf

please upload it here



Consultee Shamsul Hoque (1338584)

Email Address PlanningEE@NationalHighways.co.uk

Company / Organisation National Highways

Address Spatial Planning operations (East)

Woodlands Bedford MK41 7LW

Event Name 4. Broomfield Neighbourhood Plan Reg 16

Consultation

Comment by National Highways (Shamsul Hoque - 1338584)

Comment ID BNP-30

Response Date 19/06/24 16:20

Status Processed

Submission Type Email

Version 0.6

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / community action / appendix number below

11.4 Traffic and Travel

Question 2

Please add your comments below

Traffic and Travel: We support the principles of the traffic and transport objectives. National Highways is keen to get involved with the Chelmsford's Future Transport Study Corridor (CFTN) if not already involved; para 11.4.

See attached letter for more detail.

Question 3

Do you wish to be notified of the decision on the Yes Broomfield Neighbourhood Plan?

If you wish to submit any supporting information, BNP-29 National Highways - Attachment.pdf please upload it here



Consultee Shamsul Hoque (1338584)

Email Address PlanningEE@NationalHighways.co.uk

Company / Organisation National Highways

Address Spatial Planning operations (East)

Woodlands Bedford MK41 7LW

Event Name 4. Broomfield Neighbourhood Plan Reg 16

Consultation

Comment by National Highways (Shamsul Hoque - 1338584)

Comment ID BNP-31

Response Date 19/06/24 16:20

Status Processed

Submission Type Email

Version 0.6

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / community action / appendix number below

7.4 Housing

Question 2

Please add your comments below

Housing: In relation to the proposed housing growth, National Highways is already aware of the 'North of Broomfield' and Strategic Growth 8 proposal for 450 dwellings (up to 512 dwellings); para 7.4. See attached letter for more detail.

Question 3

Do you wish to be notified of the decision on the

Broomfield Neighbourhood Plan?

Yes

If you wish to submit any supporting information, please upload it here

BNP-29 National Highways - Attachment.pdf



Our ref: NH/24/06599 Broomfield Nh Plan Your ref: Broomfield Neighbourhood Plan

Consultation

Planning Policy Team Spatial Planning Services Chelmsford City Council Civic Centre, Duke Street Chelmsford, CM1 1JE National Highways Spatial Planning Operations (East) Woodlands Manton Lane Bedford MK41 7LW

19 June 2024

Via email to: planning.policy@chelmsford.gov.uk

Attention to:

Dear Sir/Madam,

CONSULTATION ON BROOMFIELD NEIGHOURHOOD PLAN

Thank you for your correspondence, dated on 08 May 2024, notifying National Highways of the consultation above.

National Highways is responsible for the operation, maintenance, and improvement of the Strategic Road Network (SRN) in England on behalf of the Secretary of the State. In the area within and surrounding the Broomfield Neighbourhood, we have responsibility for the trunk road A12.

We have completed our review of the details and information provided Broomfield Neighbourhood Plan 2022-2036, dated January 2024.

National Highways comments below:

Vision Statement: We support the principles for the proposed Vision Statement and Objectives, which are presented in the document.

Housing: In relation to the proposed housing growth, National Highways is already aware of the 'North of Broomfield' and Strategic Growth 8 proposal for 450 dwellings (up to 512 dwellings); para 7.4.



Traffic and Travel: We support the principles of the traffic and transport objectives. National Highways is keen to get involved with the Chelmsford's Future Transport Study Corridor (CFTN) if not already involved; para 11.4.

In addition to above, National Highways is already involved in the recent consultation with the Chelmsford Local Plan.

National Highways do not have any comment, especially on the following documents-

i) The Basic Conditions Statement ii) A Consultation Statement iii) SEA Environmental Report.

We do not have any more comments on this.

Please contact us <u>PlanningEE@nationalhighways.co.uk</u> if you require any clarification.

Yours faithfully,

Assistant Spatial Planner



Consultee Parish Clerk Mark Hembury (1157089)

Email Address clerk@broomfield-pc.gov.uk

Company / Organisation Broomfield Parish Council

Address 158 Main Road

Broomfield CM1 7AH

Event Name 4. Broomfield Neighbourhood Plan Reg 16

Consultation

Comment by Broomfield Parish Council (Parish Clerk Mark

Hembury - 1157089)

Comment ID BNP-32

Response Date 19/06/24 14:39

Status Processed

Submission Type Email

Version 0.5

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / community action / appendix number below

General

Question 2

Please add your comments below

At its last meeting on 12th June 2024, the Parish Council asked me to respond to the consultation to highlight the Council's continuing and whole-hearted support for the Broomfield Neighbourhood Plan (NP), as submitted to the City Council recently.

Of course, when the decision was taken to submit the NP, parish councillors had another full discussion about the draft Plan, including (but not limited to) the comments made during the Regulation 14 Consultation.

This current response is therefore intended to be high-level only, as there is no need to repeat what has already been said and submitted. The Council would just wish to repeat that the NP process has been a long, thorough and comprehensive process, involving local residents and stakeholders, so councillors are confident that it represents the settled will of the local community. The evidence base is also comprehensive and rigorous and has underpinned the entire process of developing the NP. The Vision of the NP is that:

In 2036, Broomfield will continue to be a flourishing village community, with its own distinct identity. Sustainable infrastructure and flourishing facilities will help meet the needs of residents, so that it will

be a community, as well as a convenient place to live. Its historic character, green spaces and rural surroundings will be sustained and enhanced, promoting the wellbeing of everyone who lives and works here.

Of course, this Vision feeds into, and is supported by, the NP objectives, policies and community aspirations/actions. Councillors would like you to know that they consider all these to be as important and relevant as ever for the future wellbeing of our community. They therefore have no hesitation in commending it to you again as part of this current Regulation 16 consultation; and they look forward to the completion of the remaining stages of the process.

Question 3



Agent Nick Baseley (1347823)

Email Address ask@ibaplanning.co.uk

Company / Organisation IBA Planning Ltd

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Consultee (1360491)

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Event Name 4. Broomfield Neighbourhood Plan Reg 16

Consultation

Comment by Roka Nixy Ltd (- 1360491)

Comment ID BNP-33

Response Date 19/06/24 16:17

Status Processed

Submission Type Web

Version 0.7

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / community action / appendix number below

General

Question 2

Please add your comments below

Please see attached documents

Question 3

Do you wish to be notified of the decision on the

Broomfield Neighbourhood Plan?

Yes

If you wish to submit any supporting information, please upload it here	BNP-33 IBA Planning - Attachment 1.pdf
If you wish to submit any supporting information, please upload it here	BNP-33 IBA Planning - Attachment 2.pdf
If you wish to submit any supporting information,	BNP-33 IBA Planning - Attachment 3.pdf



Consultation on Broomfield Draft Neighbourhood Plan

PAPER COMMENTS FORM

This form has three parts:

- Part A Consultation Details
- Part B Your Contact Details
- Part C Your Comments on the Draft Neighbourhood Plan

Part A – Consultation Details

Chelmsford City Council is consulting on the following:

Broomfield Neighbourhood Plan

How to comment

You can read and comment on the Broomfield Plan on the City Council's Consultation Portal at www.chelmsford.gov.uk/planningpolicyconsult. This is a simple way of making your comments, and you can sign up to be notified about future planning policy consultations.

Alternatively, comments can be made using this form and returned by:

- Email planning.policy@chelmsford.gov.uk
- Post Spatial Planning Services, Chelmsford City Council, Civic Centre, Duke Street, Chelmsford, CM1 1JE

For further information about how the Consultation Portal works, read our Consultation Portal User Guide at: www.chelmsford.gov.uk/lp-portal-guide.

If you need help to make your comments, please call our Helpline on 01245 606330, or e-mail planning.policy@chelmsford.gov.uk

Closing date for comments

Please return this form by 4.00pm on Wednesday 19 June 2024.

Please note that comments made verbally or anonymously cannot be accepted.

For further information about the Broomfield Plan consultation, please read the Consultation Guidance Note available on this page: www.chelmsford.gov.uk/broomfieldplan

How your comments will be used

The Council will acknowledge receipt of your comments and fully consider them, although we will not enter into individual correspondence.

All duly-made comments will be published on the Council's Consultation Portal in accordance with the General Data Protection Regulations.

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Part B – Your Contact Details

Personal details	Agent details (if applicable)
Title	TitleMR
First Name	First NameNICK
Last Name	Last NameBASELEY
Organisation (if you are making comments on behalf of an organisation)	Organisation (if you are making comments on behalf of an organisation)
ROKA NIXY LTD	
AddressC/O IBA PLANNING LTD	Address IBA PLANNING LTD THE STUDIOS CHURCH FARM, MANSFIELD RD EDWINSTOWE, NOTTS
Postcode	PostcodeNG21 9NJ
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E-mail address	E-mail addressask@ibaplanning.co.uk
Consultation ID (if known)	Consultation ID (if known)
Signature	SignatureNICK BASELEY
Date	Date19/06/2024

Part C – Your comments on the Broomfield Plan

Please indicate clearly which paragraph/figure/appendix number your comments relate to – without this your comment cannot be considered.

If you wish to comment on more than one paragraph/figure/appendix number, please complete a continuation sheet for each one.

You may find it useful to refer to the Consultation Guidance Notes available on this page: www.chelmsford.gov.uk/broomfieldplan

Broomfield Plan	Paragraph/figure/ appendix number:
Your Comment:	
	PLEASE SEE ATTACHED LETTER

Do yo	u wisl	h to be notified	of the decisi	on on the Bro	oomfield Neig	ghbourhood Plan?
Yes	Х	No				

Please complete a continuation sheet if you wish to comment on more than one Paragraph/figure/appendix number.

Any comments received after 4.00pm on Wednesday 19 June 2024 cannot be accepted.

If you wish to submit any supporting information, please ensure they contain no signatures, e-mail addresses or personal postal addresses.

This paper comments form can be made available in alternative formats such as large print, and other languages. Please call (01245) 606330 or email planning.policy@chelmsford.gov.uk.

Thank you for taking the time to submit your comments.



Consultation on Broomfield Draft Neighbourhood Plan

CONTINUATION SHEET

Name:	Postcode:

- Please indicate clearly which paragraph/figure/appendix number your comments relate to without this your comment cannot be considered
- If you wish to submit a comment on more than one paragraph/figure/appendix number, please complete a continuation sheet for each one
- You may find it useful to refer to the Consultation Guidance Notes available on this page: www.chelmsford.gov.uk/broomfieldplan

Paragraph/figure/ appendix number:	
	Paragraph/figure/appendix number:

Please complete a continuation sheet for further comments if you wish to comment on more than one Paragraph/figure/appendix number.

Any comments received after 4.00pm on Wednesday 19 June 2024 cannot be accepted.

If you wish to submit any supporting information, please ensure they contain no signatures, e-mail addresses or personal postal addresses.

This paper comments form can be made available in alternative formats such as large print, and other languages. Please call (01245) 606330 or email planning.policy@chelmsford.gov.uk.

Thank you for taking the time to submit your comments.



Spatial Planning Services Chelmsford City Council Civic Centre Duke Street Chelmsford CM1 1JE

BroomfieldNP/1 19 June 2024

Dear Sirs

Broomfield Neighbourhood Plan 2022-2036

Submission Draft January 2024

Please find enclosed our representations on the above, which are submitted on behalf of our client, <u>Roka Nixy Ltd</u> – owner of Roselawn Farm and 19.92 ha of surrounding land (edged red on the enclosed **Location Plan**).

In general, our client supports the Broomfield Neighbourhood Plan as currently drafted and congratulates all those involved, in recognition of the hard work and input of many to pull a document such as this together.

In terms of any specific comments on the Submission Draft, our client has just one – and this relates simply to the inclusion of Important View No.12 on Map 6.

Whilst the identification of Important Views is an important consideration, it must reasonably follow that any such view must be open to (and appreciated by) the general public.

Important View No.12 is on private land – and therefore not a view that anyone other than the landowner could appreciate/attain.

This being the case, it is respectfully submitted that it should not included on Map 6 alongside other Important Views in the final version of the Neighbourhood Plan.

Whilst responding to the Submission Draft, our client considers it might be helpful for the Parish Council to be aware of their future development aspirations/intentions - and the extent of their landholding.

In the above connection, Roselawn Farm currently comprises a mix of established agricultural, equestrian and commercial businesses within the built-up area of Broomfield.

The table on page 21 of the Submission Draft records the 'Sensitivity/Capacity' issues relative to Landscape Character Area C: Chelmer Valley at Roselawn and Campion Farms.

More particularly it states that:

"The collection of buildings at Roselawn Farm also offer opportunities for reorganisation and redevelopment although in all scenarios access restrictions from the existing urban edge may present significant constraints. Care would need to be taken to ensure the outer edge of any new development is rural in character and possibly adopts a farm courtyard arrangement. A modest small-scale development in this area of the valley may also present opportunities for improved access and changes to land management which restores the quality and condition of the landscape, strengthening its character and its valued role adjacent to urban areas."

In the above connection, our client is currently contemplating the sensitive reorganisation/redevelopment of the existing Roselawn Farm site for continued commercial development, embracing the farm and courtyard concept suggested in the above extract.

As part of the same, they also wish it to be known to the Parish Council that they are open to working with them to explore opportunities of creating linked footpaths/cycle paths, alongside wider landscape and biodiversity initiatives in line with Community Action CA6 – Improving Public Access to the Chelmer River Valley.

They also note paragraph 6.35 of the Submission Draft which suggests "there may be scope to realign and upgrade the existing rough track to make it less prominent and more serviceable, thought this would need to be discussed and agreed with all the landowners affected".

Our client has a legal right of way over the rough track referred to above, which currently provides the access to their agricultural, equestrian and commercial site and would be willing to work alongside other landowners to help facilitate (and possibly part fund) the Neighbourhood Plan's objective of improving the access as part of his redevelopment proposals.

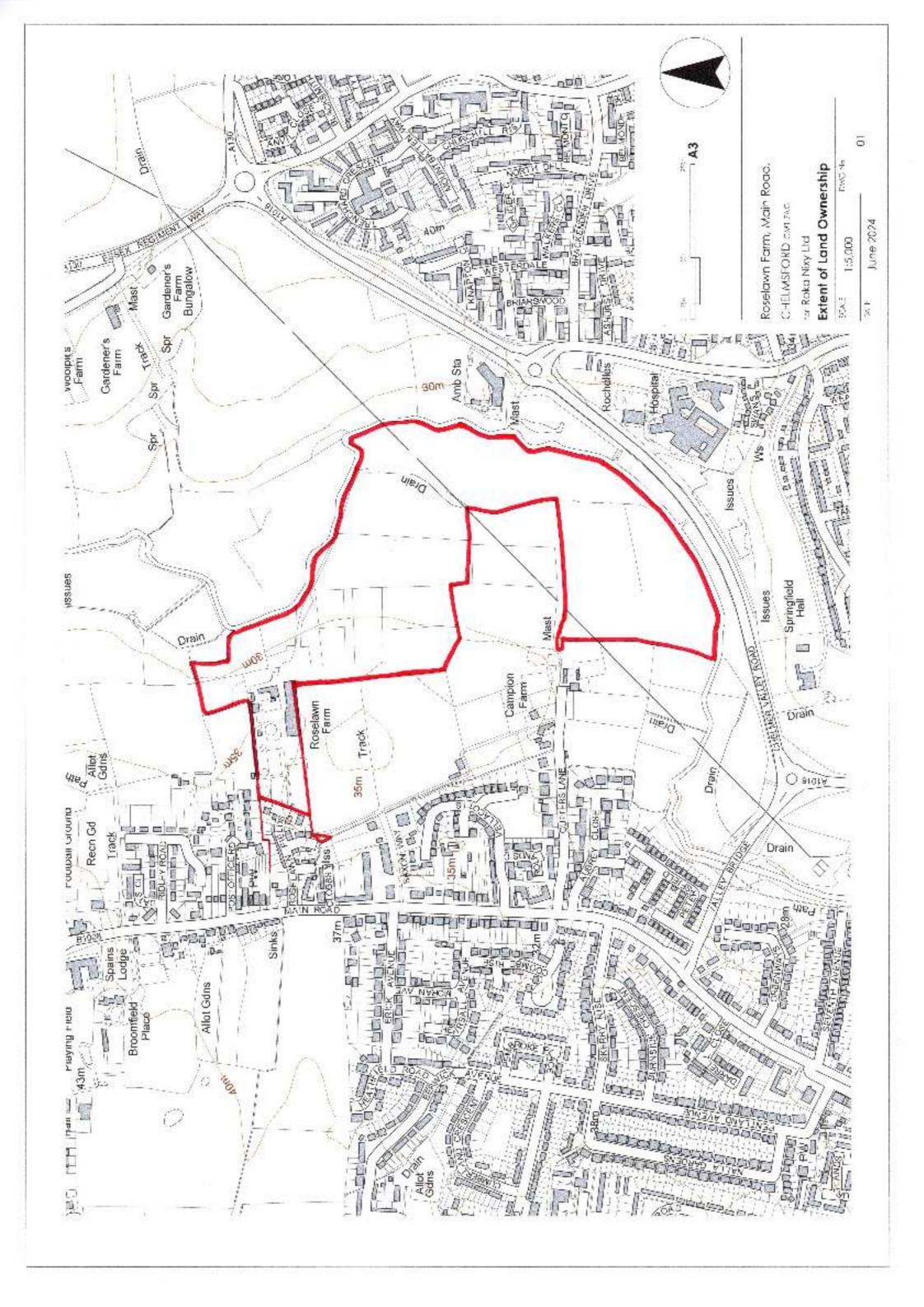
I trust the above is helpful at this stage of the consultation process — and I would be grateful if you could pass on a copy of these representations to the Parish Council directly in order that our client can commence engaging pro-actively and positively with them at the appropriate stage.

Kind regards.

Yours sincerely

Nick Baseley MA(Hons)TP MRTPI Director







Comment

Consultee Mr Dave Vicary (311259)

Email Address

Address

Event Name 4. Broomfield Neighbourhood Plan Reg 16

Consultation

Comment by Mr Dave Vicary (311259)

Comment ID BNP-34

Response Date 19/06/24 14:13

Status Processed

Submission Type Email

Version 0.4

Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / community action / appendix number below

Site BFD10; Community Action CA14

Question 2

Please add your comments below

Please see attached letter

Question 3

Do you wish to be notified of the decision on the

Broomfield Neighbourhood Plan?

Yes

If you wish to submit any supporting information,

please upload it here

BNP-34 Dave Vicary - Attachment.pdf

Representations on Broomfield Neighbourhood Plan

Policy BFD10 - LAND EAST OF SAXON WAY

Pages 47 to 50 off the Plan deal with a site for a community housing project on land east of Saxon Way. In my earlier comments I pointed out that nowhere in the constraints is the provision of suitable vehicular access mentioned.

There is no mention whatsoever in the submitted Plan of catering for the extra vehicles generated by the development and how this would impact on surrounding roads and existing residential properties. In addition to the new housing a GP surgery would generate a significant number of car trips. A concept plan that does not show how vehicular access will be obtained is seriously flawed and not fit for purpose.

Presumably the Parish Council is assuming that access to the site will be via Saxon Way. Because of the failure to clearly show this in the Plan nearby residents may not have realised that there will be an impact on their residential environment and therefore not have responded to the Regulation 14 Pre-Submission Consultation.

Policy BFD10 – LAND EAST OF SAXON WAY therefore fails to consider the impact of the additional traffic generated by the development on both nearby residents and highway safety on Main Road.

Because of these reasons this policy should be deleted from the Plan.

In its response to my comments on the Regulation 14 Pre-Submission Consultation the Council says, "This is a matter for the detailed planning application". A planning application could be submitted now to allow all the issues to be properly considered. This would also allow those residents who did not realise (because of the incomplete information in the Plan) the impact on their residential amenities to submit comments. that would result from this proposal. Indeed residents may not be aware of the impact of this proposal as included in the Submitted version of the Plan

If planning permission is granted it would be a quicker method of achieving the development rather than waiting for the Neighbourhood Plan process to be completed.

Community Action CA14 - Strategy to Encourage Sustainable Travel

Fig. 4 on page 69 off the Plan shows proposals for new cycle routes including a potential cycle path between Broomfield Hospital and the Park and Ride. I consider this cycle path is ill conceived and should be omitted from the Plan.

At the Regulation 14 Pre-Submission Consultation I made several comments on this potential route none of which I consider have been addressed adequately by the Council in its responses.

Original comment

The Park and Ride site and parts of the route are outside the area covered by the Plan so that the inclusion of this route probably does not comply with the relevant regulations

Council's response

The proposal does not form party (sic) of a planning policy and there (sic) does not need to meet the Basic Conditions.

Additional Representations

All of the route of the cycle path east of the B1108 is outside the area covered by the Neighbourhood Plan. The Council's response uses the term "proposal" as does the title of Fig 14. For clarity I would suggest that the route is only shown as far as the B1108 with an arrow annotation showing the destination as the Park and Ride.

Original comment

The cycle path will intrude into this sensitive landscape. The route will have to be lit especially during the winter months. The lighting infrastructure will impact on the landscape during daytime. When the lighting is being used there will be a visual impact as well as light pollution that will have an impact on wildlife particularly because of the proximity to the Nature Reserve.

Council's response

Environmentally sensitive lighting is available that can be used on such schemes without impacting on habitats and the landscape.

Additional Representations

The Council's response cannot be correct because all lighting must have some impact on wildlife and the landscape because otherwise it would not be fit for purpose. The Council has failed to respond to the impact of the cycle path and lighting structures during daylight hours.

Original Comment

The path is very unlikely to meet Secured by Design principles or the recommendations of SUSTRANS. The route is very isolated and not overlooked by houses or close to populated areas.

Council's Response

Many rural routs (sic) would not meet these requirements

Additional Representations

Rural cycle paths are generally used for leisure pursuits and are used during daylight hours

The route between the hospital and the Park and Ride is not being put forward as a recreation/leisure route but as a route to allow staff to commute to work. This will involve the route being used in hours of darkness especially during the winter months. The Council has therefore failed to address the issues I raised about crime and safety.

Original comment

The promotion of this route may lead to an increase in car journeys. The Hospital Trust is unlikely to reduce staff or patient parking provision because it provides an important income stream. Staff spaces vacated following staff use of the cycle path may be reallocated for patient/visitor use. There is likely to be only two trips generated per day if the space was used by a staff member – one at the start and finish of the shift. The same space if allocated to patients/visitors may be used by multiple visitors throughout each day increasing the trips generated by that space

Council's Response

The hospital needs to determine how it will provide for parking on site given the increasing demands. Providing alternative means of travel would help to accommodate increased demands.

Response

The Council seems to have misunderstood or ignored the thrust of my comments. The essence of my comment is that if staff members use the Park and Ride then the hospital may use any vacated spaces for patient parking. This is especially likely as fees for patient parking are an important income stream. There would be a higher turnover of parking in patient spaces than staff spaces who park for the duration off their shifts. A higher turnover of parking will result in increased traffic movements to the detriment of the environment.

Dave Vicary

19 June 2024



Comment

Agent Mr Mark Bewsey (1329615)

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Event Name 4. Broomfield Neighbourhood Plan Reg 16 Consultation

Comment by Obsidian Strategic Asset Management Ltd (Luke Garrett

- 1326424)

Comment ID BNP-35

Response Date 19/06/24 14:41

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Question 1

Which part of the document does your comment relate to?

Please write in the policy / paragraph / figure / community action / appendix number below

Vision, BFD2, BFD6, BFD8, BFD10

Question 2

Please add your comments below

Please see attachment

Question 3

Do you wish to be notified of the decision on the Yes Broomfield Neighbourhood Plan?

If you wish to submit any supporting information, please upload it here

BNP-35 Obsidian Strategic Asset Management Ltd - Attachment.pdf

planning transport design environment infrastructure land

Broomfield (Regulation 16) Neighbourhood Plan Representation

On behalf of Obsidian Strategic Asset Management Ltd

In respect of Land East of Broomfield, Chelmsford

June 2024 - MWB/LS/15438



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Appendix 1 - Landscape and Visual Technical Note



1 INTRODUCTION

1.1 PURPOSE OF THIS REPRESENTATION

1.1.1 This representation has been prepared on behalf of Obsidian Strategic Asset Management Ltd (hereafter 'Obsidian') in response to the Broomfield (Regulation 16) Neighbourhood Plan Consultation, which runs until 19th June 2024. Obsidian have interest in Land East of Broomfield, Chelmsford ('the site'), edged in red on the plan below.



FIGURE 1.1: SITE LOCATION PLAN

- 1.1.2 Paragraph 7.6 of the Neighbourhood Plan (NP) sets out the approach to site allocation within the Parish. It is noted that the NP does not allocate any sites of its own for housing, on the basis that it is said to have fulfilled its requirement to deliver at least 176 dwellings in the Parish for the period to 2036.
- 1.1.3 Therefore, we recognise that these representations are made on a non-site-specific basis, however it is relevant to note that the site has been promoted through the following processes:
 - Chelmsford Call for Sites (December 2021 and October 2022);



- Chelmsford Draft Issues and Options Local Plan (October 2022); and
- Chelmsford Preferred Options Local Plan (June 2024)
- 1.1.4 For the avoidance of doubt, this representation document is intended to be read alongside the online form which has been completed separately and refers to this document.



2 LAND EAST OF BROOMFIELD

2.1.1 It is Obsidian's intention to bring forward development proposals for a high-quality residential development on part of the land, whilst retaining a large area of open space to the east, which will serve to preserve this part of the Green Wedge in perpetuity. For the avoidance of doubt, we consider that residential development would be limited to the south western portion, sitting north of Glebe Cresent / Cricketer's Close, and east of Main Road - ensuring that the proposed development does not extend the settlement edge further east then the existing development to the immediate south.



FIGURE 2.1: OPPORTUNITIES AND CONSTRAINTS PLAN

- 2.1.2 Whilst it is the case that the eastern end of the site does fall within Flood Zone 3, Obsidian can confirm that no development would be proposed within this area, which would be retained as a substantial area of public open space. This area will include landscape enhancements such as enhanced habitat for wildlife, flood storage capacity, leisure and recreation, and increased public access within the site and immediate setting.
- 2.1.3 Existing footpaths are present in the areas surrounding the site, including via Chelmer Valley Local Nature Reserve, running approximately 2.5km from Valley Bridge to Victoria Road. This route links Chelmsford city centre to large residential areas across the north of the town via foot and bike paths through to Broomfield. The corridor adjacent to the River Chelmer presents an excellent opportunity to provide a new active travel corridor, providing new pedestrian and cycle links connecting existing public rights of way in the north towards Springfield Hall Farm and Chelmsford to the south.



- 2.1.4 Alongside opportunities for significant Biodiversity Net Gain and open space provision, the proposed development will deliver much needed affordable housing. This could be delivered in excess of policy requirements and will significantly help local people in need of housing.
- 2.1.5 The site masterplan will be landscape-led to demonstrate how a residential development could integrate into the existing settlement and landscape whilst protecting the wider setting and preventing the merging of settlements. Therefore, it is considered the site can be developed without resulting in urban sprawl or settlement coalescence, nor materially harming the role, function and intrinsic character and beauty of the Green Wedge.



3 RESPONSE TO THE DRAFT NEIGHBOURHOOD PLAN

3.1 SITE OPTIONS AND ASSESSMENT (FEBRUARY 2020)

- 3.1.1 The draft NP includes a Site Options and Assessment report prepared by AECOM, which identifies sites appropriate for allocation in the Plan based on their suitability, availability, and achievability.
- 3.1.2 The site has been evaluated under references CFS53 and CFS62 and performs well against suitability and availability criteria. Overall, it is concluded that the site is 'partially suitable for allocation' in the NP. This is because 'there may be potential for limited development within the two fields on the western edge of the site, subject to establishing suitable access and the provision of appropriate screening to reduce visual impact from across the Chelmer Valley'. Next steps include considering whether partial allocation of the site would be acceptable in light of the conclusions of a Landscape Appraisal.
- 3.1.3 Notwithstanding this, the site has been discounted due to being within the Green Wedge. It should be recognised that not all of the land is constrained, and the full extent of the Green Wedge must be continuously reviewed and considered. The Site Options and Assessment is not a policy document but is supposed to be a technical assessment of site suitability. Indeed, an arbitrary judgement of the site relative to the preferred spatial strategy reaches a 'policy on' conclusion only and does not determine whether it is indeed suitable for development.

3.2 STRATEGIC ISSUES

- 3.2.1 The 'basic conditions' tests to be applied during Examination is set out within paragraph 8(20) of Schedule 4B to the Town and Country Planning Act 1990 are as follows:
 - (a) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the neighbourhood development plan,
 - (b) the making of the neighbourhood development plan contributes to the achievement of sustainable development,
 - (c) the making of the neighbourhood development plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),
 - (d) the making of the neighbourhood development plan does not breach, and is otherwise compatible with, EU obligations, and



- (e) prescribed conditions are met in relation to the neighbourhood development plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood development plan.
- 3.2.2 Moreover, paragraph 001 Reference ID: 41-001-20190509 of the Planning Practice Guidance is clear that Neighbourhood planning is development focussed:

'Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. They are able to choose where they want new homes, shops and offices to be built, have their say on what those new buildings should look like and what infrastructure should be provided, and grant planning permission for the new buildings they want to see go ahead. Neighbourhood planning provides a powerful set of tools for local people to plan for the types of development to meet their community's needs and where the ambition of the neighbourhood is aligned with the strategic needs and priorities of the wider local area'.

- 3.2.3 During the preparation of a NP, it is vital that the strategic context is properly understood and accounted for, particularly with regard to the state of play with the Local Plan, adopted in May 2020. The National Planning Policy Framework (NPPF), revised in December 2023, requires Local Plans to be reviewed at least once every five years (NPPF paragraph 33) with reviews completed no later than five years from the adoption date of a plan. In this regard, Chelmsford City Council (CCC) are currently consulting on the Chelmsford Preferred Options (Regulation 18) Local Plan. The Local Development Scheme (LDS) which was updated in November 2023 confirms that this is not expected to be adopted until Winter 2025/26.
- 3.2.4 We note the Steering Group's intention to not allocate sites for development, on the basis that it is said to have fulfilled its housing requirement for the Local Plan period. This is stated to amount to 176 dwellings, as set out within the Housing Needs Assessment (June 2019) prepared as part of the NP evidence base. We would highlight that this assessment covers the period from 2018 to 2036. Given that more than five years have passed, it is likely that the housing need in Broomfield has increased, reflecting the findings of the Housing Needs Assessment and any unmet requirements from 2018. It is also imperative to note that the Council declared a housing crisis in February 2022 due to the worsening housing supply and affordability in Essex.
- 3.2.5 In this regard, the Steering Group will be aware that its housing requirement has not yet been tested at examination as part of the wider Preferred Options Local Plan, posing challenges in ensuring alignment with strategic policies, especially given the early stages of consultation for the City area's development plan. Amongst the conditions is a requirement to have regard to national policies and advice, and for the NP to be in general conformity with the strategic policies contained in the development plan for the area of the authority.



- 3.2.1 512 new homes are allocated in the CCC Preferred Options Local Plan at Land North of Broomfield, which straddles the boundary between Broomfield and Little Waltham Parishes. According to paragraph 7.4 of the NP, it is likely that Broomfield's share of the 'North of Broomfield' strategic site amounts to approximately 225-255 of the new dwellings and therefore the housing requirement is 'more than met by that allocation'.
- 3.2.2 Notwithstanding this, we are concerned that an increased housing need in Broomfield, combined with a lack of clarity regarding the deliverability of strategic sites could result in a significant undersupply of homes in the short to medium term.
- 3.2.3 According to the CCC Preferred Options Local Plan, dwellings are expected to be delivered at Land North of Broomfield from 2024/25, however, based on the level of information available, it is difficult to determine with any level of certainty whether the purported supply is reliable and how this relates to the NPPF definition of being deliverable.
- 3.2.4 An indicative masterplan for around 450 new homes was approved in September 2020 (ref: 20/00001/MAS), inviting the submission of a formal planning application. Subsequently an outline planning application for up to 512 dwellings was submitted in December 2020 (ref: 20/02064/OUT), with around half of these dwellings located within Broomfield Parish. The draft NP states at page 42 that this application has been approved. However, a review of the CCC planning search facility at the time of writing reveals that the application is still pending determination. In the absence of Reserved Matters, it is premature to believe there is clear evidence that it will begin delivering units as projected.
- 3.2.5 The suitability of relying on vague developer statements was recently addressed during consideration of appeal Ref: APP/Q3115/W/20/3265861 for Little Sparrows, Sonning Common, Oxfordshire where the Inspector offered clear findings on the benchmark level of evidence required to meet the deliverability tests of the PPG. The Inspector concludes evidence of deliverability requires more than just being informed by landowners, agents or developers that sites will come forward.
- 3.2.6 Furthermore, it cannot be assumed that the allocation will come forward or come forward in full. For instance, consents can lapse or the full development potential of a site may not be achieved, for example, Reserved Matters consent is granted for fewer homes than consented under the Outline permission. We note that the allocation at Land North of Broomfield has been carried forward from the adopted Local Plan (2013-2036) and the delay to this site being brought forward requires a caution approach to be adopted. Accordingly, this allocation should not be relied upon as part of the spatial strategy for Broomfield.
- 3.2.7 It is critical that the NP provides enough flexibility to respond to an evolving strategic context in Chelmsford to satisfy the 'basic conditions' required for Neighbourhood Plans to be made. As the preparation of a NP affords a local community an opportunity to decide where it feels development is most



appropriate, we would reiterate that the development at Land East of Broomfield would represent a proportionate level of growth that meets identified needs.

3.3 VISION AND OBJECTIVES

3.3.1 The consultation document sets out nine objectives for Broomfield. By way of response, we welcome the proposed objectives, particularly the commitment to ensure that there is an adequate supply of housing to meet the needs of the Parish.

3.4 POLICY BFD2: PROTECTING BROOMFIELD'S LANDSCAPE CHARACTER

3.4.1 According to draft policy BFD2, proposals for development outside the Settlement Boundary will be required to demonstrate that they conserve and enhance the unique landscape and scenic beauty within the Parish having regard to the Neighbourhood Plan Landscape Appraisal and Neighbourhood Plan Review of Local Green Space, Valued Landscape and Key Views.

Valued Landscapes and Key Views

- 3.4.2 The site is identified on Map 5 as a 'Valued Landscape' (Figure 3,1). According to the Broomfield Neighbourhood Plan Landscape Appraisal (February 2019), the site falls within Character Area A: Chelmer Valey at Butler's Farm, and Character Area B: Chelmer Valley at Mill Lane, which extends between the existing built-up edge of Broomfield and the A130. The report states that the site is highly sensitive due to its rural unspoilt character and collection of historic features. The area is also valued for its outdoor recreation and informal countryside access. The Neighbourhood Plan Review of Local Green Space, Valued Landscape and Key Views (September 2021) outlines that viewpoints 3–11 (as shown on Figure 3.1) are reflective of the qualities of this area.
- 3.4.3 Consequently, the NP concludes that development in this area would undermine the integrity of these qualities.



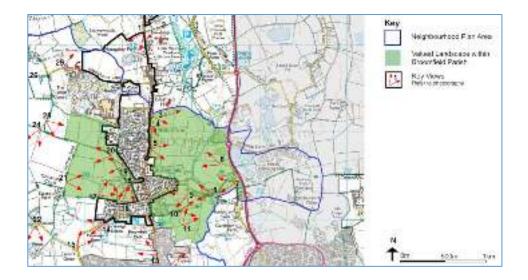


FIGURE 3.1: VALUED LANDSCAPES AND KEY VIEWS IN BROOMFIELD

- 3.4.4 Notwithstanding this, a Landscape and Visual Technical Note has been prepared by Aspect Landscape Planning Ltd which provides an overview of the baseline landscape and visual situation and potential effects arising from the proposed development of the site (**Appendix 1**).
- 3.4.5 In terms of Key Views, the Technical Note demonstrates that due to the existing topography of the immediate and local area, combined with the mature vegetation at the site boundaries and surrounding built form, views are limited to the immediate site boundaries and the permissive routes across the valley within the immediate setting to the east and south east. Beyond these points, views are mostly fleeting or intermittent due to the intervening mature vegetation and landform.
- 3.4.6 There is currently no public access or connectivity between the site and the immediate and local landscape, although there are a number of permissive routes that people use to access the local area to the north of the site which also includes the north eastern field of the site, which provide access to the river's edge. Therefore, it is considered that the proposed development of the site provides a clear opportunity to deliver a notable enhancement to the existing routes and increase the immediate PRoW network with the provision of additional informal footpaths and routes throughout any proposed public open space.
- 3.4.7 Additionally, the nature of the current arable use and the extent of mature vegetation associated with the site boundaries result in there being a clear opportunity for numerous landscape enhancements. It is concluded that the site has the capacity to accommodate a sensitively designed residential development which would not give rise to significant townscape, landscape or visual effects and is in accordance with the published landscape character assessments.



3.4.8 As a result, it is clear that development in this area would not undermine the integrity of these landscape qualities, as suggested by the NP.

3.5 POLICY BFD6: BROOMFIELD GREEN WEDGE

- 3.5.1 Draft policy BFD6 states proposals that secure enhanced access for recreational uses, including footpaths and cycle paths, in the Green Wedge will be supported, subject to the development being in accordance with the relevant strategic policies of the adopted Local Plan.
- 3.5.2 To be clear, Obsidian supports the intentions behind the principle of the Green Wedge. However, we question the necessity of a specific Green Wedge policy when less restrictive planning policies can ensure protection of open countryside as long as the housing strategy is performing as it should.
- 3.5.3 We consider that there should be a clear and direct commitment to review the extent of the Green Wedge as it is imperative that settlements like Broomfield are not artificially restrained from fulfilling their potential, and sustainable development cannot be prevented from coming forward simply due to an artificial constraint, such as the Green Wedge, as long as the natural environment and the key purpose of Green Wedge can be protected.
- 3.5.4 The Landscape and Visual Technical Note which accompanies this representation concludes that the adoption of a sensitive, landscape-led approach to the design development of the proposals would ensure that the proposals can be successfully integrated in this location that would maintain the Green Wedge and without significant adverse landscape or visual effects in the longer term. The lower landform, adjacent to the River Chelmer and which is considered to be more visually sensitive, would remain undeveloped and provide a substantial area of public open space within which structural planting will provide a soft landscape buffer to the development.
- 3.5.5 Overall, the site has capacity to accommodate new development by following existing building lines to south and west. Small proportionate release of the Green Wedge in this location would allow much needed homes to be delivered in a highly sustainable location, enabling the release of land for new active travel corridors without damaging overall purpose of the Green Wedge.

3.6 POLICY BFD8 - HOUSING MIX

3.6.1 Policy BFD8 sets out the Parish Council's preferred housing type and mix across all tenures. It is important that this policy recognises that housing needs change over time and a desired mix in 2024 will very unlikely reflect the needs in subsequent years. The policy should make it absolutely clear that private mix must be dictated by the market.



3.6.2 Additionally, it should be noted that the Chelmsford Preferred Options (Regulation 18) Local Plan sets out a different mix in terms of the size and mix for new homes. If there is a conflict between the LPU and the NP, the most recently adopted plan takes precedence. It is critical that the making of the NP is in general conformity with the strategic policies contained in the development plan in order to satisfy the 'basic conditions' required for Neighbourhood Plans to be made.

3.7 POLICY BFD10: LAND EAST OF SAXON WAY

- 3.7.1 Notwithstanding that the NP purports that there is no requirement to allocate sites for housing, Land East of Saxon Way is identified for community-led affordable housing, new open green space and community facilities (including land for a GP surgery) to be delivered by and managed through a Community Land Trust or similar body.
- 3.7.2 Similarly to our client's Land East of Broomfield, the site lies just inside the Green Wedge, where development must not 'materially harm the role, function and intrinsic character and beauty of the Green Wedge'. It must not lead to 'urban sprawl and settlement coalescence' and must provide for 'wildlife, flood storage capacity, leisure and recreation, and travel by cycling and walking' and allow for good public access.
- 3.7.3 According to draft policy BFD10, this is achieved because the development would not extend further east than the buildings at Roselawn Farm. Additionally, the open space would include water features for flood storage and features to encourage biodiversity, as well as opportunities for cycling, walking and informal leisure.
- 3.7.4 The Land East of Saxon Way is assessed in the Broomfield Neighbourhood Plan Site Options Assessment (2020) under reference CFS212, as well as in combination with the buildings at Roselawn Farm under reference BNP3. According to the Landscape Appraisal (2019), the sensitivity of this area lies in its elevated slopes and views across the valley and its role in reinforcing the rural character and separation between Broomfield and Chelmsford. Nevertheless the nature of the valley topography and gentle knoll of higher land south of Roselawn Farm is stated to present some opportunities for a carefully thought through extension of the urban edge. Although the Landscape Appraisal suggests that small-scale development in this area may be acceptable, the Site Options Assessment concludes that this site on its own is not suitable for allocation and should be excluded from the assessment as it would result in a prominent and isolated incursion into the Green Wedge.
- 3.7.5 The Land East of Broomfield (ref: CFS53) also performs well against suitability and availability criteria but is ultimately discounted due to its location in the Green Wedge. Unlike the Land East of Saxon Way, our client's site sits north of Glebe Cresent / Cricketer's Close, and east of Main Road ensuring that the proposed development does not extend the settlement edge further east then the existing



development to the immediate south. As aforementioned, the Assessment recognises that there may be potential for limited development within the two fields on the western edge of the site. Comparatively, the Land East of Saxon Way relies on the redevelopment of Roselawn Farm so as not to appear incongruous with the wider settlement.

3.7.6 It is not clear, therefore, why the Land East of Saxon Way has been carried forward for allocation within the NP, contrary to the findings of the Neighbourhood Plan Site Options Assessment, when there are other more suitable sites in Broomfield.



4 CONCLUSION

4.1 REPRESENTATION SUMMARY

- 4.1.1 This representation has been prepared on behalf of Obsidian Strategic Asset Management Ltd in response to the Broomfield Regulation 16 Neighbourhood Plan consultation, which runs until 19th June 2024.
- 4.1.2 The making of a Neighbourhood Plan provides an excellent opportunity for a parish or community group to have influence and control over development within the defined Neighbourhood Area. However, it is critical that the NP provides enough flexibility to respond to an evolving strategic context in Chelmsford to satisfy the 'basic conditions' required for Neighbourhood Plans to be made.
- 4.1.3 Obsidian has concerns that an increased housing need in Broomfield, combined with a lack of clarity regarding the deliverability of strategic sites could result in a significant undersupply of homes in the short to medium term. As a result, the allocation at the Land North of Broomfield should not be relied upon as part of the spatial strategy for Broomfield.
- 4.1.4 Opportunities to provide much needed new housing alongside community infrastructure within the proposed Green Wedge must be utilised, where these protect the wider purposes of the Green Wedge.
- 4.1.5 Obsidian control 'Land East of Broomfield' and are promoting the site for residential allocation as part of the emerging Local Plan process. The site is close to the urban area of Broomfield and would form a natural and logical development east of the settlement. The proposal would not be out of context and presents opportunities to improve access across the immediate and local area and to recreational facilities, enhance the local and wider landscape and improve biodiversity through habitat creation.
- 4.1.6 I trust the contents of this representation are clear and I hope the comments are useful in guiding the forthcoming stage of the plan making process.



APPENDIX 1



Landscape & Visual Technical Note

Project: Land at Broomfield, Chelmsford (7413)

February 2021

1 Introduction

- 1.1. Aspect Landscape Planning Ltd has been commissioned by Obsidian Strategic to review potential landscape and visual matters and provide an overview of any likely landscape constraints and opportunities present within the site. A desktop study and site visit have been undertaken alongside a high level review of the landscape and visual situation in order to provide recommendations for developing the site and any necessary landscape mitigation that may be required.
- 1.2. This technical note provides an overview of the baseline landscape and visual situation and potential effects arising from the proposed development of the site the note provides information to support the promotion of the site. It is anticipated that a full Landscape and Visual Impact Assessment will be undertaken at the appropriate planning stage.

2 Baseline Assessment

- 2.1. The site is formed of agricultural land, c10.91 hectares (26.95 acres), and lies adjacent to the eastern settlement edge of Broomfield, a village and residential suburb of Chelmsford. The settlement edge of Broomfield extends to the south western and western site boundaries. The site is located on the relatively shallow western valley slopes of the River Chelmer, which runs adjacent to the eastern site boundary on a north / south axis. The landform within the site rises from the eastern boundary at approximately 28m Above Ordnance Datum (AOD) to a high point at the western boundary of 40m AOD. The landform to the east rises, forming the eastern valley slopes, to around 48m AOD, approximately 800m to the east of the site. The Wider landscape to the north and south is defined by the shallow River Chelmer valley with the landscape to the east and west, once beyond the valley, gently undulates between 39m 52m AOD.
- 2.2. The site consists of five fields, two small square fields of rough grassland define the western edge, two medium sized arable fields define the central / eastern area, with a linear arable field, running along the River Chelmer, forming the north eastern part of the site. The vegetation associated with the site is restricted to the field boundaries which consist of mature hedgerow with hedgerow trees, there is a notable single mature tree located within the northern central field of the site. However, the mature vegetation structure has over time become degraded, most notably to the northern site boundary where the boundary hedgerow is absent from the eastern part. The local and wider landscape is defined by the shallow river valley which along with notable area of woodland that includes Newland Grove Nature Reserve- to the east of the site, defines the local character.
- 2.3. Features of note within the landscape include Newlands Groove Nature Reserve, Broomfield Conservation Area, and a number of listed building, these are;



- Newlands Nature Groove Nature Reserve, located on the eastern edge of the River Chelmer, directly east of the site;
- Broomfield Conservation Area this lies to the west of the B1008 / Main Road, approximately 105m from the western site boundary. The Conservation Area is centred around St Mary with St Leonard C of E church and its immediate setting, within this there are a number of listed buildings; and
- Butlers Grade II Listed, located adjacent to the western site boundary, accessed from the B1008 / Main Road.
- 2.4. There is existing residential development backing onto the western and western section of the southern site boundary, located off White Mead, Glebe Crescent and Cricketers Close, respectively. Residents of the properties adjacent to the site boundaries have a range of views over the site, where some have removed the rear boundaries to take in the immediate setting others have heavily filtered views as a result of intervening mature vegetation and typical boundary fencing. This existing development and roads that bound the site provide a settlement edge character to the site. In addition to this the local landform and mature vegetation structure provide a degree of separation between the site and the more open landscape to the north and south.
- 2.5. At present there are two existing vehicular access points into the site, located of White Mead, at the western boundary and Cricketers Close to the southern boundary, respectively.
- 2.6. Overall, the immediate and local landform together with the mature vegetation structure and existing built form result in views towards/over the site being limited to the site boundaries, the immediate setting and the higher ground within the wider area to the east and west.
- 2.7. The location and context of the site is illustrated on **ASP1** Site Location Plan and **ASP2** Site and Setting Plan.

Public Rights of Way (PRoW)

- 2.8. There are no PRoW within the site, the closest route Footpath 225_42 runs parallel to the eastern edge of the River Chelmer and provides a connection between East Regiment Way and the local landscape to the north of the site. The Centenary Circle Long Distance Route (LDR) along with number of footpaths and bridleways run within the local landscape to the south and south east of the site, these include;
 - Centenary Circle LDR this route around Chelmsford passes via Sandon, Chignal Smealey, Galleywood, Writtle, Broomfield and the River Chelmer. Within the locality of the site it passes through a number of fields within the wider landscape to the south, where it meets Mill Lane, approximately 290m to the south of the site, it crosses over the River Chelmer and heads south east along the route of Footpath 234_11 where it joins Little Waltham Road. The route then heads north, along Little Waltham Road for a short section, it turns east, crossing Essex Regiment Way and through a new residential estate.



- Bridleway 214_38; which starts at Broomfield Mill, from here is runs east along Mill Lane, on rising landform, ending at the junction between Mill Lane and Little Waltham Road, approximately 475m to the east of the site.
- Footpath 234_37 runs from Essex Regiment Way, approximately 200m east of the site, the route heads west, falling towards the River Chelmer, where at the river's edge is head north. the route continues into the local landscape.
- Footpath 234_28 heads east from Main Road, approximately 475m to the north west of the site, the route passes through a large arable field on falling landform towards the River Chelmer. At the river's edge it joins a number of routes which provide a good level of connectivity between the river and the local valley.
- 2.9. There is currently no public access or connectivity between the site and the immediate and local landscape, although there are a number of permissive routes that people use to access the local area to the north of the site which also includes the north eastern field of the site, which provide access to the river's edge. Therefore it is considered that the proposed development of the site provides a clear opportunity to deliver a notable enhancement to the existing routes and increase the immediate PRoW network with the provision of additional informal footpaths and routes throughout any proposed public open space.

3 Landscape Related Policy

Chelmsford Local Plan 2013-2036 – Adopted May 2020

- 3.1. The Chelmsford Local Plan outlines the strategic priorities and long-term vision for Chelmsford and identifies locations for delivering housing and other strategic developments, setting out a Spatial Strategy to deliver this vision. The Local Plan sets out the amount and location of new development, and how places will change and be shaped throughout the Local Plan period and beyond. Planning applications will be determined against the Development Plan unless material considerations deem otherwise.
- 3.2. The following policies are considered to be of some relevance to the site and its setting, in terms of landscape character:
 - S4 Conserving and enhancing the natural environment;
 - S11 The Role of the Countryside;
 - B) Green Wedge

The Green Wedge has an identified intrinsic character and beauty and is a multi-faceted distinctive landscape providing important open green networks, which have been instrumental in shaping the City's growth, character and appearance. These networks prevent urban sprawl and settlement coalescence and provide for wildlife, flood storage capacity, leisure and recreation, and travel by cycling and walking, which allows for good public access which will be further improved through the requirements of development allocated in the Local Plan. Development



which materially harms the role, function and intrinsic character and beauty of the Green Wedge will not be approved.

- DM7 New buildings and structures in the Green Wedge; and
- DM9 infilling in the Green Belt. Green Wedge and Rural Areas;
- DM17 Trees. Woodland and Landscape features;
- DM23 High Quality and Inclusive Design; and
- DM24 Design and Place Shaping Principles in Major Developments.

Broomfield Conservation Area

3.3. The Broomfield Conservation Area Appraisal provides an assessment of views towards the conservation area. The site does not contribute to any important views of the conservation area; however, the appraisal considers that there are partial and glimpsed views possible towards the conservation area from the site. Any potential views from the site are heavily filtered by the intervening mature vegetation within the site, which in combination with the intervening built from provides a degree of separation between the site and the conservation area.

Broomfield Village Design Statement - 2011

3.4. The Broomfield Village Design Statement (VDS) aims to help ensure that future development or modification of existing buildings and open spaces in the Parish of Broomfield should integrate as well as possible with the best our village has to offer.

Landscape Character

- 3.5. The Braintree, Brentwood, Chelmsford, Maldon And Uttlesford Landscape Character Assessments 2006, undertaken by Chris Blandford Associates, identifies that the site is located within A River Valley landscape Character Type (LCT) and subdivision A6 Upper Chelmer River Valley Landscape Character Area (LCA) the assessment identifies that the key characteristics as:
 - "Narrow valley, with a restricted valley floor.
 - Small meandering river channel on the left side of the valley close to the rising ground of the valley side.
 - Dense riverside trees.
 - Arable valley sides with a fairly open character.
 - Small linear settlements occupy the upper valley sides or straggle down to a few bridging points.
 - Historic watermills and Second World War pillboxes are distinctive features.
 - Mostly tranquil away from Great Dunmow, Chelmsford and the A120."



3.6. The assessment provides a description of the overall character of the LCA, it also sets out key planning and land management issues and a proposed landscape strategy objective;

"The River Chelmer and its valley stretches from the southern edge of the historic town of Thaxted with its tall church spire and wind mill, southwards to the point at which the river meets the urban edge of Chelmsford. It is a narrow valley within the surrounding gently undulating boulder clay plateau. There are several small tributary streams that form valley sides such as the Stebbing Brook that joins the River Chelmer north of Felsted. The gently undulating valley floor has an enclosed character and restricted views often framed by the many riverside and hedgerow trees, a string of small wet woodlands and the sloping valley sides. The undulating valley sides which are steep in places, have a more open character with low thick but fragmented hedgerows, scattered hedgerow trees and only occasional woods separating the large arable fields that line the valley sides meeting at the river. The fields to the east of the River Chelmer tend to be larger and more regular in shape. Those to west of the river tend to be smaller pastoral fields or areas of rough pasture or wet meadow in the small floodplain with larger arable fields dominating the valley sides. As the River Chelmer approaches Chelmsford it becomes more sinuous and meanders further from the east valley side. The majority of the settlements excluding Great Dunmow are situated high on the valley sides with very limited modern development. Great Dunmow is located within the western side of the river valley with the urban edge crossing the river and forming a finger of new development on the east side of the valley to the south of the main town. The new development dominates views across the valley south of the town. The river valley is lined by roads running parallel to the valley along the top of the valley sides. There are also a few small narrow lanes that cross the river before joining the road on the opposite valley side. Variety and interest is provided by the presence of a number of local vernacular buildings with timber-frames, bright colour washed walls and thatched roofs. Examples of such houses include a group of 17th century timber-framed houses clustered around the Manor in Little Easton. The motte and ditch of Great Easton castle with the ground so Easton Hall also provides a visible landmark. Barnson Hall and Lodge, Liberty Hall, Chatham Hall and associated deer park also contribute to the character and overall strong sense of place. There is an overall sense of tranquillity within the river valley, with a comprehensive network of public rights of way and narrow lanes winding through the landscape. The river valley permeates Chelmsford introducing an important green corridor of 'natural' character into the urban fabric of the town.

Visual Characteristics

- The church tower at Great Easton (St. John and St. Giles), Little Easton (St Mary the Virgin), Little Dunmow (St. Mary the Virgin) and Barnston (St. Andrews) and the spire of the church in Thaxted form landmarks within views into and across the valley slopes.
- Generally open views from the valley sides into the gently meandering valley floodplain, which are framed in places by small patches of woodland.
- Enclosed and framed views along the valley corridor

Proposed Landscape Strategy Objectives



Conserve - seek to protect and enhance positive features that are essential in contributing to local distinctiveness and sense of place through effective planning and positive land management measures.

Enhance - seek to improve the integrity of the landscape, and reinforce its character, by introducing new and/or enhanced elements where distinctive features or characteristics are absent.

Suggested Landscape Planning Guidelines

- Consider the visual impact of new residential development and farm buildings upon valley sides.
- Conserve and enhance cross-valley views and characteristic views across and along the valley.
- Ensure any new development on valley sides is small-scale, responding to historic settlement pattern, landscape setting and locally distinctive building styles.
- Protect and enhance the role of the river valley in providing a network of informal open space and nature conservation sites.

Suggested Land Management Guidelines

- Conserve and enhance the existing hedgerow pattern, and strengthen through planting where appropriate to local landscape character.
- Conserve and manage areas of ancient and semi-natural woodland as important historical, landscape and nature conservation features.
- Conserve and manage the ecological structure of woodland, copses and hedges within the character area.
- Strengthen the recreational role of the woodland resource.
- Conserve and promote the use of building materials, which are in keeping with local vernacular/landscape character.
- Conserve and enhance the green 'natural' character of the river valley through appropriate management of wildlife habitats."

The Visual Environment

- 3.7. An initial site visit has been undertaken and the Photographic Record is appended to this technical note. Due to the combination of landform, mature vegetation structure within and associated with the site boundaries and built form within the localised setting, views of the site are largely restricted to the immediate setting and the higher ground within the local landscape to the east.
- 3.8. Views into the site are possible from the immediate boundary, Glebe Crescent and Cricketers Close to the southern site boundary (ref viewpoint 1a & b) and White Mead (Ref viewpoints 2). Further glimpsed views from the south along Mill Lane are possible from field access points (ref viewpoint 4) with the majority of potential views heavily filtered by roadside



vegetation. A permissive network of paths run within the immediate setting to the east of the river, these provide slightly elevated views towards and over the site, which also take in the existing settlement edge, from the eastern valley slope, (ref viewpoint 3 & 6), these routes connect with the local PRoW network. To the south east, which includes Centenary Circle LDR, there are a range of views towards and over the site and existing wider settlement of Broomfield (ref viewpoint 5 & 7). Footpath 214_37 runs adjacent to the eastern edge of the river which allows for views over the north eastern part of the site (Ref viewpoints 12 & 13).

- 3.9. Beyond the immediate setting, there are fleeting glimpsed views, through breaks in the roadside vegetation, possible from the Essex Regiment Way located along on higher ground to the east (Ref viewpoints 8). When approaching the site from the north west along Main Road / B1008 views are restricted by the local falling landform in combination with the existing intervening mature vegetation and built form (Ref viewpoints 9). Further to the north a footpath crosses a large arable field that defines the local landscape, from here views of the site are heavily screening by the intervening landform and mature vegetation (Ref viewpoint 10 & 11).
- 3.10. Overall as a result of existing topography within the immediate and local area in combination with the mature vegetation structure to the site boundaries and surrounding built form views of the site are limited to; the immediate site boundaries and the permissive routes that run across the valley within the immediate setting of the site to the east and south east. Beyond these points views become fleeting or glimpsed as a result of intervening mature vegetation and landform. There are clear opportunities to enhance the degree of enclosure to the site and in doing so ensuring that there is a sensitive and sympathetic transition between the urban edge and rural landscape, which also retain the green corridor within which the River Chelmer runs.

4 Landscape and Visual Review and Opportunities & Constraints

- 4.1. Given the scale and location of the site there is a potential risk of adverse landscape and visual effects if the proposals are not carefully and sympathetically designed. However, it is envisaged that the development of this site will adopt a high quality, landscape-led approach ensuring that the proposals can be successfully integrated without significant adverse effects upon the receiving landscape character or visual environment. Refer to plan **ASP3** Landscape Opportunities and Constraints Plan.
- 4.2. Any development within the site should incorporate the following elements:
 - Retain and enhance the existing internal and site boundary vegetation as part of the site wide green infrastructure, where possible, creating a characteristic and robust landscape setting for the new development. This would substantially enhance the existing vegetation that defines the site boundaries with additional proposed incidental internal green spaces breaking up the massing of any proposed development and reinforcing the landscape character;
 - The site wide green infrastructure, to include native structural planting, should reflect the local character and help mitigate any potential harm to the; immediate residential area to the south and west; on the local townscape landscape character; and the visual environment, in particular;



- Respond to and respect the setting and views from the PRoW within the immediate setting and local area, which also includes a network of permissive routes and nature reserve;
- Respond and maintain the character of village, existing residential properties and roads adjacent to the site boundaries;
- Layout to include a significant area of Public Open Space within the eastern part of the of the site remaining free of development.
- Landscape buffers to the northern and eastern section of the southern site boundaries will provide an appropriate distance between the proposed development and the immediate more open landscape setting. This in combination with the proposed public open space to the eastern part of the site, within which would be extensive structural landscape planting, would ensure that the proposed development is set within a robust vegetation framework which will provide a sensitive and sympathetic verdant setting to the village edge when viewed from the east;
- Create opportunities to increase public access and provide connectivity to the existing permissive / public rights of way within the local landscape. The layout should include areas of public open space that provide a benefit to not only the proposed residents but also to the existing residents within the locality. The enhanced / easily accessible open spaces within the Site would not only assist in the provision of formal and informal recreation facilities but break up the built environment and assist in placemaking;
- Create new, varied habitats that are characteristic of this landscape setting. In particular, native hedgerow, hedgerow trees and riparian vegetation should be incorporated into the landscaping scheme to reinforce the presence of this characteristic local landscape feature and to increase connectivity between the existing habitats off site;
- Adopt a positive outward looking layout to ensure that the proposals do not appear to be turning their back on the receiving landscape and create an appropriate transition between the built environment and immediate landscape;
- Incorporate a simple palette of materials and architectural detailing that reflect the local vernacular.
- The inclusion of an organic site layout, limiting any proposed development within the western and the western part of the central fields. This would leave the eastern part of the central fields and the north eastern field open, devoid of development, within which a landscape that reflects the local character would be established. This would also ensure that any proposed development relates well to the existing settlement pattern. The layout should look to provide an enhanced settlement character, that would allow the proposals to be seen an as integrated feature within the context of the wider rural setting.
- 4.3. Overall, it is considered that the combination of local landform, vegetation structure and built form alongside the proposed landscape treatment, would ensure that the proposals benefit from a high degree of physical and visual integration. The proposals will retain the



open space along the river and maintain the Green Wedge whilst also reflecting the local landscape character and providing a high level of visual containment. The assessment of landscape opportunities and constraints would feed into the emerging masterplan to ensure that a sympathetic layout that respects its landscape and visual context can be achieved.

5 Summary

- 5.1. In understanding the nature of the impacts on the existing townscape and landscape character this note provides some clarity on how the site could be developed. The nature of the landform within the site and immediate setting, along with mature vegetation structure that characterises the site's setting and existing built form provide a degree of enclosure to the site and would assist the integration of future proposed built form within the site from the outset.
- 5.2. As set out above, the site is not subject to any qualitative landscape designations. However, the site is located within a defined Green Wedge Policy S11 The Role of the Countryside; B) Green Wedge. Built form would be limited to the western extent of the site, ensuring that the proposed development does not extend the settlement edge further east then the existing development to the immediate south. Therefore it is considered the site can be developed without resulting in urban sprawl or settlement coalescence.
- 5.3. The eastern part of the site would be left devoid of built form providing a substantial area of public open space that includes landscape enhancements, such as enhanced habitat for wildlife, flood storage capacity, leisure and recreation, with an increase in public access within the site and immediate setting. These would be designed to improve the habitat and nature of the landscape adjacent to the River Chelmer, thereby retaining the overall intrinsic character of the Green Wedge.
- 5.4. As part of an iterative design process the defining characteristics of the local landscape and site context will inform the proposed layout to provide a cohesive development that responds sensitively to the existing landscape character and provides localised and wider landscape enhancements.
- 5.5. The nature of the current arable use, the extent of mature vegetation associated with the site boundaries result in there being a clear opportunity for numerous landscape enhancements. A landscape strategy should look to retain the features of value and provide a site wide strategy that establishes a greater level of connectivity with the immediate and local landscape.
- 5.6. In addition, the adoption of a sensitive, landscape-led approach to the design development of the proposals would ensure that the proposals can be successfully integrated in this location that would maintain the Green Wedge and without significant adverse landscape or visual effects in the longer term. The lower landform, adjacent to the River Chelmer and which is considered to be more visually sensitive, should remain undeveloped and provide a substantial area of public open space within which structural planting will provide a soft landscape buffer to the development. These enhancements would provide a robust verdant setting to the proposed development, reflect the characteristics of the local landscape and ensure that the character of the local landscape and settlement is maintained / enhanced.
- 5.7. As a result of existing topography within the immediate and local area in combination with the mature vegetation structure to the site boundaries and surrounding built form views of



the site are limited to; the immediate site boundaries and the permissive routes that run across the eastern slightly elevated valley slopes to the immediate setting of the site to the east and south east. Beyond these points views become fleeting or glimpsed as a result of intervening mature vegetation and landform. There are clear opportunities to enhance the degree of enclosure to the site and in doing so ensuring that there is a sensitive and sympathetic transition between the urban edge and rural landscape, which also retain the green corridor within which the River Chelmer runs.

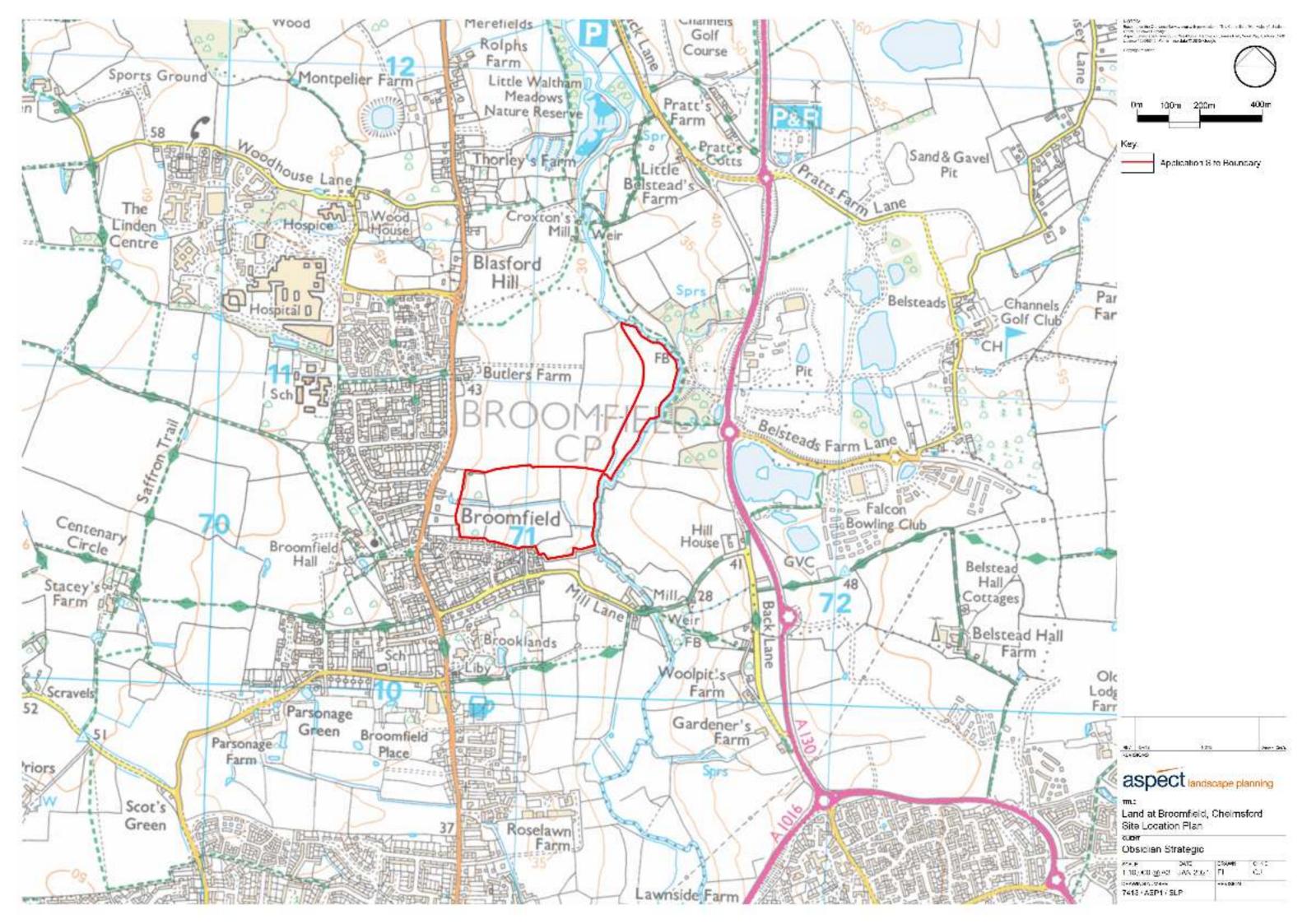
5.8. It is considered that the site has the capacity to accommodate a sensitively designed residential development which would not give rise to significant townscape, landscape or visual effects and is in line with adopted planning policy, and the published landscape character assessments. Proposed development would not be out of context and presents opportunities to improve access across the immediate and local area and to recreational facilities, enhance the local and wider landscape and improve biodiversity through habitat creation.

Aspect Landscape Planning Ltd

19th February 2021

Enclosed:

Plan ASP1 Site Location Plan
Plan ASP2 Site and Setting Plan
Photographic Record to include Viewpoint Location Plan













viewpoint 1B

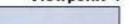






N.B. IMAGES TO ILLUSTRATE THE EXISTING LANDSCAPE CONTEXT ONLY. Panoramas are created from multiple photographs taken using a digital equivalent of a 35mm camera with 50mm lens in line with best practice and current guidance. Images illustrate a horizontal field of view of 68° and when printed at A3, should be viewed at a distance of 330mm curved through the same radius in order to correctly illustrate the existing landscape context. To ensure considered judgements are accurately assessed, images should not be substituted for visiting the viewpoint.

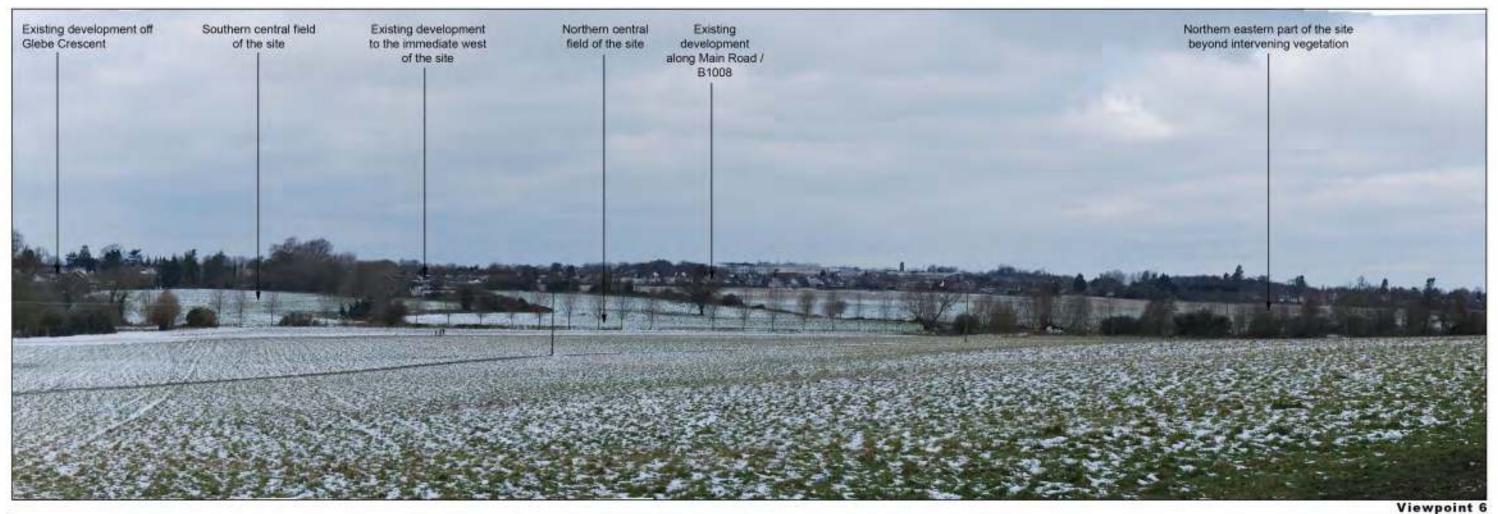


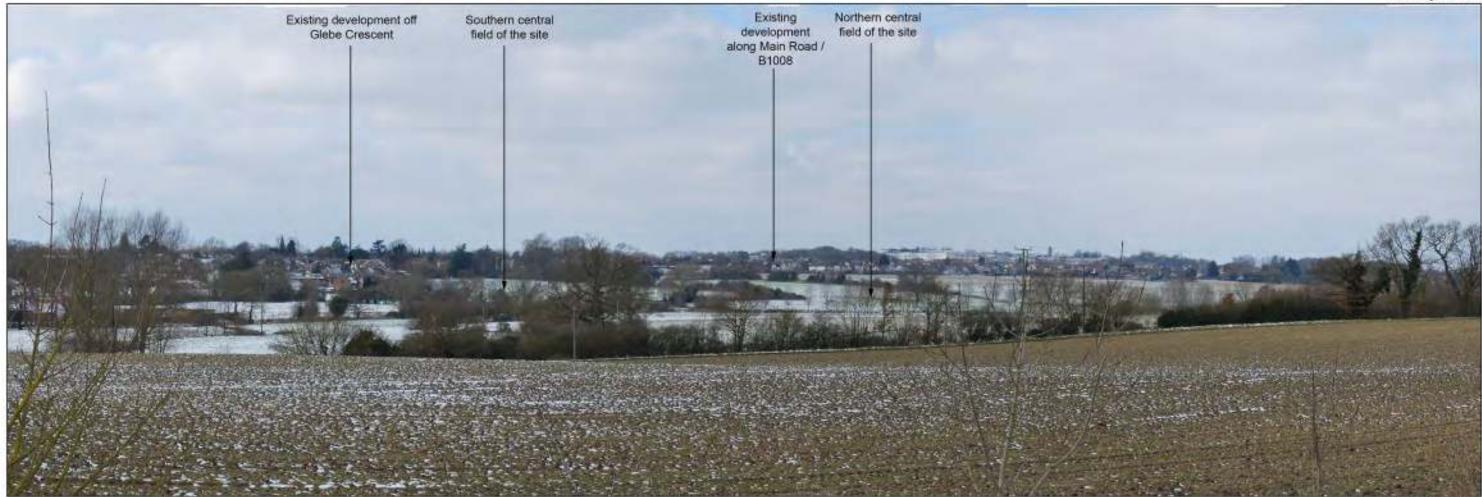








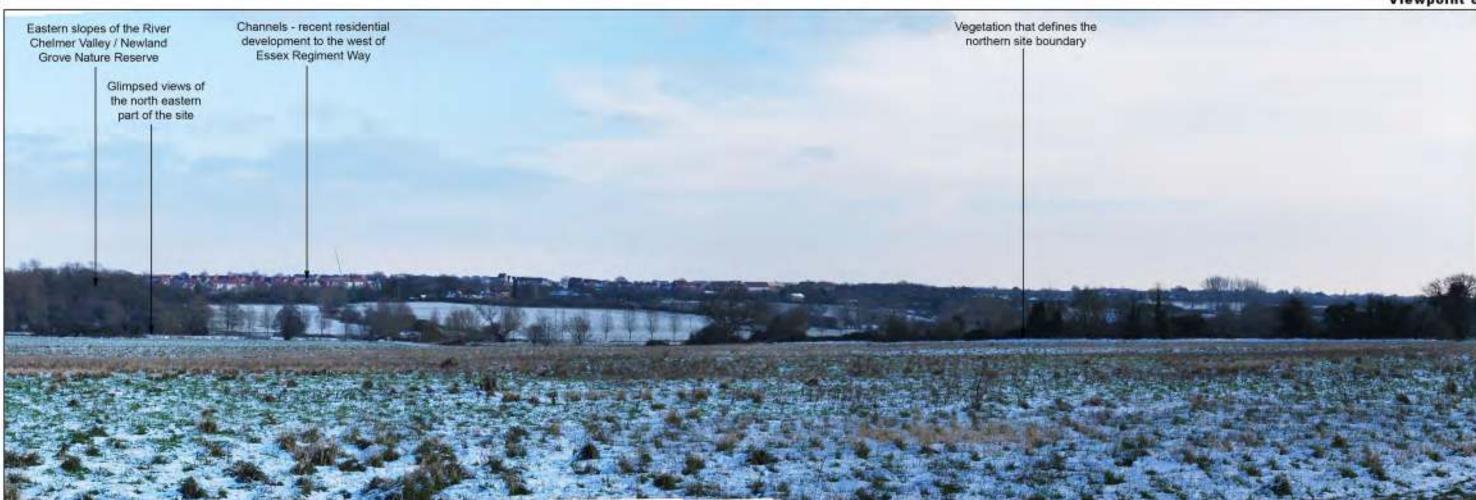






Viewpoint 7















Viewpoint 11







Viewpoint 13