

Matters and Issues for the Chelmsford Draft Local Plan Examination

Matter Statement

Matter 7 - Employment and Retail Development

November 2018

**Matters and Issues for the Chelmsford
Draft Local Plan Examination**

Matter 7 – Employment and Retail Development

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1.0 INTRODUCTION

Chelmsford Draft Local Plan Examination, November 2018

- 1.1 This statement has been prepared by Barton Willmore on behalf of Bloor Homes Eastern, pursuant to Matter 7: Employment and Retail Development. This follows representations to the Regulation 19 pre-submission consultation (references PS1248, PS1250, PS1251, PS1252, and PS1253).

2.0 MATTER 7 – EMPLOYMENT AND RETAIL DEVELOPMENT

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

Special Policy Areas

***Question 51.** The Plan designates 6 Special Policy Areas (SPA) outside the built-up areas as defined in Strategic Policy S9, Policies SPA1-SPA6 and on the Policies Map.*

***a.** Is the Plan clear on how SPA designation will be used to support functional and operational requirements at these locations?*

2.1 To the extent that the policy is concerned with Council support for health related proposals supporting the role, function and operation of Broomfield Hospital, Bloor Homes' comments are limited to that section of SPA1 dealing with the provision of an access road and the safeguarding of a route. The position is set out in a Statement of Common Ground.

***b.** Is it appropriate for Policy SPA1 to require the proposed development at Strategic Growth Site 6 to provide an access road to the hospital from Main Road? What safeguarded route is referred to within the SPA and is this justified?*

2.2 Provision of an access road to the hospital is referred to in the draft Local Plan as a strategic objective (para 7.287). An 'indicative' or 'diagrammatic route' is included in Map 8. Our Hearing Statement to Matters 6 and 6b includes reference to the access road and strategy for its delivery. A Statement of Common Ground (SoCG) includes reference to such a road being a staff access road to be facilitated across land in Bloor control and across such safeguarded land as the hospital may consider appropriate. The SoCG considers route alternatives for staff access as distinct to a specific 'safeguarded' route.

2.3 Our representations at **Appendix A**, made suggested amendments to draft policy SPA1 to clarify the point on facilitation only in terms of a route through to the hospital. Both the Schedule of Additional Changes, dated June 2018 (ref. SD 002) and Schedule of Minor Changes, dated June 2018 (ref. SD 003) have not incorporated changes.

-
- e. Overall are the SPA designations and their boundaries sound? Are any changes, such as those proposed by the Council in SP002, necessary for soundness?*

2.4 We consider that the SPA designations and their boundaries sound, insofar as the SPAs will enable the 'operational and functional requirements of these facilities or institutions to be planned in a strategic and phased manner'. However, there are inconsistencies between the policy wording for SPA1 and SGS6, which has been outlined within our other Hearing Statements to Matters 2 & 5, and are summarised as follows:

- SPA1 makes clear that *'New development proposals at Strategic Growth Site 6 - North of Broomfield, to the north of the Hospital, will provide a new access road to the Hospital from Main Road (B1008)'* (emphasis added).
- Draft Policy SGS6 states *'Provide a new vehicular access road to serve the development and provide access to Broomfield Hospital and Farleigh Hospice...'*
- The Local Plan need make clear that SGS6 cannot unilaterally provide a new access road on SPA1.
- Illogical and unreasonable to have the policy outcome sitting within a policy for a different site.

2.5 The Council's Schedule of Additional Changes document, dated June 2018 (SD 002), does not include any proposed changes to the draft policy wording of SPA1. There is a minor change to the policies map in support of SPA1 (map 8 – Broomfield), found at AC262, which includes an arrow to show the 'extended proposed link road'. However, we had made clear in our representations (**Appendix A**) to the Regulation 19 consultation, the need for changes to the wording of policy SPA1 to ensure there is consistency between SPA1 and SGS6. Accordingly, the suggested changes identified at pages 17 and 18 of **Appendix A** are applicable.

Representations made on behalf of Bloor Homes Eastern

In respect of the Chelmsford Draft Local Plan
(Regulation 19 – Publication Draft)
January 2018
Pre-Submission Document

March 2018

**Representations made on behalf of
Bloor Homes Eastern**

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APPENDICES

Appendix 1: Landscape and Visual Appraisal (LVA), dated March 2018

Appendix 2: Characteristics Plan

1.0 INTRODUCTION

1.1 These representations are made in respect of land north of Broomfield Hospital, Woodhouse Lane, Broomfield, Chelmsford, on behalf of Bloor Homes Eastern ('Bloor Homes'). The representations are made in respect of the Pre-Submission Chelmsford Draft Local Plan, which is subject to public consultation during the period 31st January 2018 to 14th March 2018.

1.2 This document considers and comments upon the follow policies:

- Strategic Growth Site 6 – Land North of Broomfield Hospital;
- Policy SPA1 – Broomfield Hospital Special Policy Area;
- Strategic Policy S11 – Infrastructure Requirements.

1.3 Representations are submitted on the following key issues:

- The need for greater flexibility in site allocations to support the Local Plan's housing trajectory;
- The role medium sized sites have to play in the overall allocations mix and vital role SGS6 can have in this context. The potential role of SGS6 in addressing primary education capacity in the medium and longer term;
- Support for a masterplan-led consideration of site capacity. The need for maximising developable areas on allocated sites;
- The importance of not placing overreliance on new strategic releases/allocations;
- Clarity and consistency in the policy framework and delivery strategy to enable a Secondary Access to Broomfield Hospital.

1.4 Bloor Homes is well advanced in its assessment of and commitment to Strategic Growth Site (SGS6). Technical studies, highways assessment, baseline studies to support environmental impact assessment (EIA) and masterplanning are in place. This diligent approach has been followed in supporting the interpretation of the site, the master planning response to date, and the drafting of the Local Plan through consideration of site characteristics and context. Thus it has been possible to consider early on site characteristics and opportunities, the capacity of the site and mitigation.

1.5 Bloor Homes is committed to working closely with Chelmsford City Council (CCC), the Parish Councils of Broomfield and Little Waltham and engaging with the Broomfield Neighbourhood Plan and wider community in the evolution of the proposed development

for SGS6. The draft allocation is broadly supported, subject to representations made in this document, and pre-application masterplanning and statutory engagement is underway with a view to an early planning application and delivery of high quality homes, designed in such a way as to maintain and enhance the integrity of the village of Broomfield, early in the plan period.

- 1.6 Bloor Homes wishes to participate within the Examination-in-Public on the matters discussed within these representations.

2.0 HOUSING NEED & SUPPLY

2.1 The following observations are made in respect of the housing need and the plan's capacity for delivery:

- The current Objectively Assessment Housing Need (OAHN) for Chelmsford is 18,515 dwellings over the plan period 2013-2036 (805 dwellings per annum);
- The Council has accounted for the Government's proposed standardised methodology for calculating OAHN. This would increase the housing requirement to 19,600 dwellings in the plan period (980 dwellings per annum);
- The draft Local Plan identifies a total of 21,893 dwellings to be delivered over the plan period;
- According to the Council's Annual Monitoring Report (November 2017), the Council has averaged 595 dwelling completions per annum between 2001 and 2017.

Need for Greater Flexibility

2.2 The Council's housing delivery rate since 2001 is significantly short of the 980 dwellings per annum that the Council would need to achieve under the new local plan. To achieve this ambitious build out rate, the Council will need to allocate a range of sites that are deliverable and support the housing trajectory across the local plan period. In reality, however, housing delivery is often uneven and large sites can have lengthy lead-in times or require significant investment in infrastructure. Failure and delays to delivery can also occur through fragmented ownership, reliance on strategic infrastructure outside of the control of the promoter and economic cycles, to name but a few.

2.3 Whilst the draft Local Plan appears to have a land supply that can in theory deliver the housing requirements, there is no flexibility built in should any of the proposed sites fail to deliver sufficient numbers within the plan period.

2.4 Whilst the logic for allocating major strategic sites is understood, reliance on these to deliver the critical housing needed without adequate flexibility elsewhere in the City is considered unsound.

Overreliance on Strategic Sites

2.5 Policy Strategic Growth Site 4 – North of Chelmsford, provides a draft allocation for a 3,000 home 'Garden Community'. This proposed 'new settlement' is supported by a range of

infrastructure requirements, most notably the Chelmsford North East Bypass. This is seen as critical infrastructure without which the 'Garden Community' is unlikely to come forward within the proposed plan period. Growth Site 4 will inevitably have much longer lead-in times and more complex infrastructure / financing arrangements, meaning it will only deliver housing in the longer term and towards the end of the plan period.

- 2.6 The Council should not rely on this new settlement as one of the principal drivers of housing growth later in the plan period, as the rate of development at the former Boreham Airfield will not be predictable. As such, it is unlikely that all 3,000 homes will be delivered within the proposed plan period. Specifically, the Housing Trajectory identified within the Draft Local Plan identifies 2,450 dwellings within the last 10 years of the plan period (2026-2036). This equates to 245 dwellings per annum, which is a substantial and potentially unachievable delivery rate.
- 2.7 It should also be emphasised that the reality of economic cycles must be factored in to the ability of local plans to deliver. The disproportionate impact of an economic downturn on large strategic sites is widely understood, arising from the impact on the availability and cost of borrowing, build costs and viability, leading to considerable delays. Examples include Northstowe in Cambridgeshire and Wixams in Bedfordshire, both of which have taken decades to deliver meaningful numbers of new homes. Smaller and medium sized sites conversely perform much better in this situation, being more straightforward to deliver and thus less exposed.
- 2.8 Accordingly, there should be sufficient flexibility within the draft Local Plan to allow other more sustainable locations, with less associated risks, to provide additional housing numbers if deemed necessary. Site 6 – North of Broomfield, is available, realisable and deliverable. The site provides for a sustainable form of development, with good public transport connections into Broomfield itself and Chelmsford. Broomfield Hospital, one of the largest employers in Chelmsford, is located adjacent to the site. Accordingly, the site North of Broomfield (SGS6) has the potential to accommodate a number of new homes, safeguarding against the risk of other sites such as Site 4 (Growth Area 2 – North Chelmsford) not coming forward within the plan period.
- 2.9 It is also important to ensure smaller and medium sized sites are not only allocated, but their capacities maximised to deliver early in the plan period. SGS6 provides the right balance as a medium size site in a highly sustainable location, which is deliverable and has the support of a developer in securing and implementing planning permission.

3.0 CONSIDERATION OF STRATEGIC GROWTH SITE 6

- 3.1 Bloor Homes supports in principle the allocation of SGS6, for a residential development. This Site is in a sustainable location, well placed to local services within Broomfield, and will enhance the vitality and sustainability of the existing settlement. Given its proximity to Chelmsford and the strategic road network, the Site is ideally suited to contribute to the area's future housing need.
- 3.2 The site is located to the north of Chelmsford, approximately 12km to the south of Braintree on the northern edge of the existing village of Broomfield, and to the south west of Little Waltham. The Site comprises approximately 28 hectares of agricultural land and lies immediately to the west of the B1008 and north of Broomfield Hospital.
- 3.3 Broomfield village is located either side of the B1008, which is the north-south transport corridor serving North West Chelmsford and connecting to Chelmsford City Centre. Woodhouse Lane forms the southern boundary of the Site with residential dwellings, Puddings Wood and Farleigh Hospice located immediately adjacent to the south of the Site. Sports pitches and a sports pavilion are located to the west of the Site with agricultural fields located beyond. Areas of undeveloped, agricultural fields are also located to the north of the Site. The Site (SGS6) is not subject to any ecology, heritage or landscape designations. These points are expanded on within this representation.
- 3.4 The policy identifies that the quantum of residential development to be achieved on site is 'around 450 dwellings'. Whilst the site is capable of providing this level of development as a minimum, capacity studies commissioned by Bloor Homes identify that a greater number of dwellings could be achieved on site without compromising the ability of the site to deliver a high-quality edge of settlement development that respects its rural setting whilst providing all necessary environmental mitigation, open space provision, drainage and strategic planting. Bloor Homes supports an amendment to the Policy SGS6 providing flexibility to determine the capacity of the Site through the masterplanning process rather than imposing an artificial restriction.
- 3.5 It is understood that the current capacity of the Broomfield Primary School would be expanded to cater for projected growth. On that basis, the proposed Regulation 18 consultation residential capacity for SGS6 was revised downwards from 'around 800 homes'. Whilst this may be a justifiable restriction in education terms, our own consideration of site and context indicates a potential 650-750 homes being accommodated on the site. This capacity includes for a reserve site to provide a 2FE primary school. The

proposed development of SGS6 could therefore achieve more than the 450 dwellings identified within the draft policy, which should not be overlooked particularly in respect of concerns noted above around the ability of Garden Communities to deliver within the plan period. Accordingly, it is reasonable therefore, that the use of the wording 'around 450 dwellings' does not inhibit or restrict residential development that exceeds this figure, and the optimum capacity should be defined through detailed studies.

- 3.6 The Council's Local Plan Housing Trajectory (2013 – 2036) identifies that the SGS6 will start delivering houses as from 2020/21, providing 40 units in the first year. While Bloor Homes supports the Council's proposed trajectory and is committed to the early delivery of housing on the site, it is considered that a greater number of homes can in fact be built over the defined period.
- 3.7 As previously referenced, Growth Area 2 (North Chelmsford) has been identified to deliver a total of 4,550 dwellings (including 3,000 dwellings at North East Chelmsford) over the plan period. According to the Council's trajectory, around 1,502 dwellings are proposed towards the end of the plan period (i.e. 2031/32 – 2035/46). Most of these dwellings relate to the North East Chelmsford site. With this in mind, and given the optimistic trajectory for North East Chelmsford, it should be emphasised that SGS6 can accommodate a larger number of dwellings early in the plan period thereby offsetting the risk of under delivery and the plan being found unsound at examination.
- 3.8 In addition to housing need and capacity, the Council has identified within their SHMA (dated 2015), that there is a high need for 3 bed properties, both in terms of private and affordable provision.
- 3.9 Bloor Homes is committed to delivering homes that are needed. Given the likely size of dwellings required, this is another reason to ensure the capacity of the site is not limited to an artificially low number of dwellings. It is important that Bloor Homes is able to design and deliver a scheme that responds to local needs.

Site Capacity

Landscape Assessment

- 3.10 A Landscape and Visual Appraisal (LVA), dated March 2018, has been undertaken by Barton Willmore on behalf of Bloor Homes (**Appendix 1**). Within the LVA and associated appendices, the Site has been assessed in terms of landscape character and visual impact.

- 3.11 A desktop review was undertaken to identify landform, landscape features, landscape designations and relevant landscape policy, and to review published landscape character information. This information was used as the initial basis against which to appraise the Site.
- 3.12 A visual appraisal of the Site was also undertaken to consider the nature of existing views from publicly accessible viewpoints including roads, Public Rights of Way (PRoW) and public open spaces. Views were considered from all directions and from a range of distances.
- 3.13 The report notes that 'the Site is relatively visually well contained'. From the south, views towards the Site are limited to those from the immediate southern boundary, due to the presence of built development and Puddings Wood to the south. From the west, views are limited to the western area of the Site and these are filtered. The remainder of the Site is screened by the fall in the landform when viewed from the west. From the north, the northern boundary of the Site is visible from Lark's Lane and footpaths within approximately 1km. The majority of the Site is screened from these locations due to the topography and the presence of Sparrowhawk Wood. The greatest visibility is from the east, from Blasford Hill which extends along the north-eastern boundary, and from footpaths on the opposite side of the valley. From most of these locations, it is the north-eastern area of the Site which is visible, with much of the remainder of the Site screened by the topography and development along Blasford Hill. The north-eastern corner of the Site also forms an important part of the perceived separation of development on Blasford Hill within Broomfield and development within Little Waltham to the north. From the limited number of locations where the majority of the Site is seen, it is mainly viewed within the context of the surrounding development, including the hospital buildings south of Woodhouse Lane.
- 3.14 In addition, a characteristics plan has been undertaken which identifies existing features within and adjoining the site, which would influence the developable area, attached as **Appendix 2**. This plan reinforces the findings of the LVA, though also incorporates consideration of attenuation ponds which are considered appropriate for the Site.

Ecology & Nature Conservation

- 3.15 Ecological assessments have also been undertaken in respect of SGS6. The majority of the existing land is used for arable farming. As such, the ecological value of the land is relatively low. There are existing physical features within the site that contribute to any

potential ecological value, which include field boundary hedgerows and the former mineral workings to the east, that is now water filled.

- 3.16 The findings of the ecological assessment identify areas for mitigation and enhancements, which include, for example, retention and reinforcing of existing hedgerows; creating green corridors that could potentially link to Sparrowhawk Wood; extensive tree/woodland planting; and enhance the network of SuDS to benefit wildlife.

Food Risk and Drainage

- 3.17 The site gently slopes from the north western ridge, down towards the east and south eastern corner. An assessment on drainage concluded that the eastern part of the site has the potential to accommodate shallow infiltration drainage via soakaways and other SuDS features. It is considered that these drainage features are sufficient in mitigating the impact of the proposed development.

Transport and Access

- 3.18 The development of the site provides the opportunity to provide an access road across the Site that could be connected to Broomfield Hospital via Puddings Wood. The point of access to the site would be from the north east, off the B1008. The indicative line for this access road is shown on the Policy Map 8 and is supported by Bloor Homes.
- 3.19 The modelling work undertaken within Essex Highways Pre-Submission Strategic & Local Junction Modelling (dated January 2018) considers the draft allocation of 800 homes within North of Broomfield. The same modelling work within the document has assessed the downward revised dwellings numbers. The modelling work identifies that the reduction in the number of proposed dwellings in Broomfield as part of Local Plan development proposals has resulted in lower levels of forecast modelled traffic flows along Main Road, Broomfield. This has resulted in a positive impact in terms of traffic flows. Overall, from the initial modelling work of 800 homes, now down to 450 dwellings, this has resulted in a reduced trip generation and is deemed positive in terms of traffic flows for the proposed development.
- 3.20 The proposed development can create new pedestrian and cycle links within the Site and connecting to the existing network. There is an existing PRoW (footpath No. 29) that crosses the site from Woodhouse Lane, heading north into Sparrowhawk Lane. In addition, the draft Policies Map 8 identifies a new cycle route which crosses through Puddings Wood and onto Woodhouse Lane. The proposed development has the potential to increase

demand for bus services in the local area and existing services may be rerouted to serve the Site.

4.0 INFRASTRUCTURE REQUIREMENTS

4.1 Policy SP11 states that *'New development must be supported by sustainable means of transport to serve its need including walking, cycling and public transport modes. New highway infrastructure should help reduce congestion, link new development and provide connections in the strategic road network. These include but are not limited to... [a] New access road to Broomfield Hospital'*.

4.2 The draft allocation for SGS6 identifies numerous items of supporting infrastructure requirements. These include the following:

- Neighbourhood Centre;
- Provision of a new stand-alone early years and childcare nursery;
- Provide a new vehicular access road to serve the development and provide access to Broomfield Hospital and Fairleigh Hospice;
- Provide pedestrian and cycle connections;
- Provide a well-connected internal road layout which allows for bus priority measures
- Create a network of green infrastructure;
- Provide suitable SuDs and flood risk management;
- Land (circa 0.13 hectares) for a stand-alone early years and childcare nursery (Use Class D1) and the total cost of physical scheme provision with delivery through the Local Education Authority;
- Appropriate improvements to the local and strategic road network as required by the Local Highways Authority;
- Appropriate measures to promote and enhance sustainable modes of transport;
- New and enhanced cycle routes, footpaths, Public Rights of Way and bridleways where appropriate;
- Provide, or make financial contributions to, new or enhanced sport, leisure and recreation facilities;
- Financial contributions to delivery of the Chelmsford North East Bypass, primary and secondary education, and community facilities such as healthcare provision as required by the NHS/CCG.

4.3 Bloor Homes is committed to delivering the necessary supporting infrastructure for the delivery of the required number of homes to be accommodated on site, in accordance with the CIL Regulations 2010, in particular Regulations 122 and 123. It is noted within the Council's Infrastructure Delivery Plan (IDP), dated January 2018, that the required infrastructure items and associated costs (where applicable) for the strategic site North of

Broomfield, are provided within Table 14.6. Bloor Homes reserves its position in supporting infrastructure subject to application of tests of viability and necessity.

- 4.4 In respect of the new vehicular access road identified in the policy, Bloor Homes is committed to providing an access and spine road through the Site to serve the new community of SGS6 facilitating the opportunity for a Secondary Access to Broomfield Hospital across land safeguarded through the policy SPA1.
- 4.5 Whilst the connection from the site to Broomfield Hospital is a matter for policies SP11 and SPA1, and beyond the scope of policy SGS6, potential routes available have been evaluated. An optimal route through Pudding Wood has been identified and this could form the basis for a safeguarded corridor through which Broomfield Hospital may explore its delivery. Bloor Homes position is to support the illustration of this on the Policies Map 8, where the Policies Map is required to "*illustrate geographically the application of the policies*" (Regulation 9(1)(c) of the Town and Country Planning (Local Planning)(England) Regulations 2012).
- 4.6 The supporting text accompanying SPA1 states that the Policies Map has been defined to 'enable the operational and functional requirements of Broomfield Hospital to be planned in a strategic and phased manner as it is outside the Defined Settlement of Broomfield where ordinarily policy would constrain new development.'
- 4.7 The draft SPA1 policy wording states '... New development proposals at SGS6 - North of Broomfield, to the north of the Hospital, will provide a new access road to the Hospital from Main Road (B1008). Development within this Special Policy Area should safeguard the route of this new road and ensure successful integration with the existing internal road network of the Hospital.'
- 4.8 However, the Local Plan, and indeed the IDP, need to take account of the CIL Regulations 2010. Whilst the Policy SPA1 is articulated in terms of 'safeguarding', the provision of a new Secondary Access to the Hospital is not necessitated by the development of SGS6. Rather, SGS6 provides the 'opportunity' for the hospital to integrate its facility with a new network. The Hospital's position is furthered by an access road to SGS6 being taken to Woodhouse Lane, from which the Hospital can then examine the completion of the access road into the hospital campus.

5.0 EDUCATION CAPACITY AND PROVISION

- 5.1 The Regulation 18 Consultation Local Plan policy SGS6 provided for a site capacity of around 800 dwellings with the inclusion of a primary school. The Regulation 19 consultation version of the Local Plan has reduced that number to 'around 450 dwellings'. The requirement to provide for a primary school has been removed. It is understood that the removal of the primary school from the allocation has necessitated the reduction in housing numbers, in effect placing an artificial constraint on the capacity of SGS6.
- 5.2 The removal of the primary school has occurred in the absence of any clear rationale. The Broomfield Primary School is identified for future expansion to cater for additional housing growth in the area. However, the expansion plans would only provide a limited capacity and would not allow for further growth. The education strategy in respect of primary school capacity is therefore considered inconsistent with the need to plan positively for growth (certainly in the terms anticipated by the current NPPF) and indeed for education provision now and beyond the plan period.
- 5.3 The high-level infrastructure requirements are set out within Draft Policy S11. These infrastructure requirements are supported by the findings of the Council's Infrastructure Delivery Plan (dated January 2018), and the Local Plan Viability Study (dated January 2018). It is noted that the Essex County Council Commissioning School Places in Essex, 2017-2022, takes no account the proposed Broomfield site, and does not appear to assess the site at either 800 dwellings (as proposed within the Issues and Options Draft Local Plan) or the current 450 dwellings. There appears to be no other supporting evidence in respect of the approach taken by Essex County Council at the North of Broomfield site.
- 5.4 Bloor Homes requests that clear supporting evidence for education provision in Broomfield is provided that allows not only for current growth but provides adequate capacity based on child yield from the actual housing mix anticipated and that the education strategy plans positively for future growth. The SGS6 site presents the opportunity for reserving a Site for new primary school. Crucially, the ability of this sustainable site to deliver critical homes for the city should not be constrained unnecessarily.

6.0 SUMMARY

6.1 A summary of the representations made is providing below.

Housing Need

6.2 The Council's Housing provision exceeds that of the their OAHN requirement. The Government's proposed Standardised Methodology requires a greater increase in the delivery of homes over the plan period. Whilst this has been accounted for within the Council's housing provision, it is considered that there is insufficient flexibility in the draft Local Plan to manage changes to housing supply and demand.

6.3 There is an overreliance on large strategic allocations for delivering a significant amount of the housing. We note that SGS4 provides for a significant number of homes towards the end of the plan period. Our experience shows that due to the complexities involved in consenting and enabling strategic sites, the lead times for delivering new homes can be considerable. There is a strong likelihood therefore that a significant proportion of SGS4 would fall in to a subsequent plan period. Accordingly, the Council should allow sufficient flexibility within other proposed housing allocations, such as SGS6, to maximise the potential of delivering new homes early in the plan period.

Site Capacity

6.4 Bloor Homes broadly supports the draft allocation SGS6, notwithstanding the representations contained in this report. It is clear from technical assessments undertaken to date that the Site can be developed to provide a high quality residential-led scheme, incorporating the necessary environmental mitigation, infrastructure and open space greater than the draft policy of 'around' 450 dwellings.

Enabling Access to Broomfield Hospital from Main Road (B1008)

6.5 The proposed draft policy wording for SGS6 refers to a 'vehicle access road to serve the development'. Bloor Homes supports the principle of an access road to Broomfield Hospital across safeguarded land within SPA1. However, the connection from the SGS6 site boundary to Broomfield Hospital is beyond the scope of SGS6. SGS6 would facilitate a new access road from Main Road (B1008) providing the opportunity for the Hospital to extend this road across safeguarded land within the Hospital campus, ensuring successful integration with the existing internal road network of the Hospital.

Education

- 6.6 The education strategy in respect of primary school capacity is inconsistent with the need to plan positively for growth.
- 6.7 Bloor Homes requests that clear supporting evidence for education provision in Broomfield is provided that allows not only for current growth but provides adequate capacity based on child yield from the actual housing mix anticipated and that the education strategy plans positively for future growth. The SGS6 site is an ideal opportunity for reserving a site for a new primary school with little if any suitable alternative sites available locally. Crucially, the ability of this sustainable site to deliver critical homes for the city should not be constrained unnecessarily.

7.0 PROPOSED DRAFT POLICY AND SUPPORTING TEXT AMENDMENTS

7.1 Draft Policy SGS6 – North of Broomfield. Amended draft policy should read as follows:

Strategic Growth Site 6 – North of Broomfield

“Land to the north of Woodhouse Lane and west of Blasford Hill, as shown on the Policies Map, is allocated for a high-quality landscape-led development that maximises opportunities for sustainable travel. Development proposals ~~will accord with a masterplan approved by the Council to~~ provide:

Amount and type of development:

- At least ~~around~~ 450 new homes of mixed size and type to include affordable housing.
- Capacity to be determined through the masterplanning process and consideration of housing mix and typologies.

Supporting on-site development:

- Neighbourhood Centre.
- Provision of a new stand-alone early years and childcare nursery located in the southern portion of the site.

Site masterplanning principles:

Movement and Access

- Main vehicular access to the site will be from Blasford Hill (B1008).
- Provide a new vehicular access road to serve the development and ~~provide~~ facilitate access to Broomfield Hospital and Fairleigh Hospice.
- Provide pedestrian and cycle connections

- Provide a well-connected internal road layout which allows where necessary and practicable for bus priority measures.

Historic and Natural Environment

- Protect the setting of historic properties and the scheduled monument surrounding the site.
- Mitigate the visual impact of the development.
- Enhance the historic environment.
- Create a network of green infrastructure.
- Provide suitable SuDs and flood risk management.
- Ensure appropriate habitat mitigation and creation is provided.
- Undertake a Minerals Resource Assessment.
- Undertake an Archaeological Assessment.

Design and Layout

- Provide a coherent network of public open space, formal and informal sport, recreation and community space within the site.

Site infrastructure requirements:

- Land (circa 0.13 hectares) for a stand-alone early years and childcare nursery (Use Class D1) and the total cost of physical scheme provision with delivery through the Local Education Authority.
- Appropriate improvements to the local and strategic road network as required by the Local Highways Authority.
- Appropriate measures to promote and enhance sustainable modes of transport.
- New and enhanced cycle routes, footpaths, Public Rights of Way and bridleways where appropriate.
- Provide, or make financial contributions to, new or enhanced sport, leisure and recreation facilities.

- **Financial contributions to delivery of the Chelmsford North East Bypass, primary and secondary education, and community facilities such as healthcare provision as required by the NHS/CCG, subject to test of viability and necessity**

7.2 The supporting text to policy SGS6 – North of Broomfield, requires several amendments to reflect the draft policy changes. These read as follows:

7.3 Para 7.288 delete and replace with:

“The opportunity for Broomfield Hospital to have a Secondary Access Road is facilitated by the development of the site. The Policy SPA1 looks to the further development of Broomfield Hospital incorporating a safeguarded corridor linking the Hospital campus roads with the B1008. The opportunity also exists for improved access to Farleigh Hospice and the King Edward VI Grammar School playing fields through the downgrading of Woodhouse Lane and North Court Road to routes for local access only.”

7.4 Para 7.292 Delete last two sentences and replace with:

“In implementing the Secondary Access Road across land safeguarded by policy SPA1, the Hospital shall consider any necessary mitigation including compensatory measures which replace any habitat lost as part of its construction.”

7.5 The text within draft policy SPA1, should read as follows:

POLICY SPA1 – BROOMFIELD HOSPITAL SPECIAL POLICY AREA

The Council will support health related proposals which support the role, function and operation of Broomfield Hospital. This includes the provision of a loop road to allow bus, service and emergency vehicles easy access into the full body of the estate; optimising access by public transport; strengthening the network of pedestrian routes and spaces to aid safety, comfort and convenience;

concentrating buildings of scale and mass within the central core of the estate; limiting the scale and mass of buildings at the edge of the estate; ensuring a phased and coherent strategy for removal of temporary buildings and their replacement with permanent structures; protecting and enhancing woodland, parkland, trees and hedgerows; minimising environmental impacts including in respect of ecology and water quality, and creating high quality public spaces. New development proposals at Strategic Growth Site 6 – North of Broomfield, to the north of the Hospital, will ~~provide~~ incorporate a new access road from Main Road (B1008) providing the opportunity for the Hospital to extend this road across safeguarded land within the Hospital campus ~~to the hospital from Main Road (B1008).~~ ~~Development within this Special Policy Area should safeguard the route of this new road and~~ ensur~~ing~~e successful integration with the existing internal road network of the Hospital.