

# Chelmsford City Council Local Plan: Preferred Option

## Response by Broomfield Parish Council – May 2017

Introductory note: In order to facilitate the consultation process by identifying common concerns, Broomfield Parish Council ('the Parish Council') has been working collaboratively with neighbouring parishes in North and West Chelmsford to agree a Statement of Common Ground. This has been submitted separately. The Parish Council's response therefore contains most elements of that Statement, with additional points relevant to Broomfield Parish only.

### **Question 1: Do you agree with the Strategic Priorities? No**

*If you do not agree with any of the Strategic Priorities please give the reasons for your answer and explain how you would like to see them changed (please specify the Strategic Priority you are referring to in your comments).*

#### **SP1**

The Plan rightly states that it should be consistent with national guidance, particularly as set out in the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG). Sustainable growth lies at the heart of the NPPF and therefore Plans must seek to deliver sustainable growth which meets the future needs of any given area.

The principle of achieving sustainable growth is supported, but SP1 does not set out clearly what sustainable principles the Plan is looking to achieve.

Fundamentally, the growth locations in north and west Chelmsford are not proven in the evidence base to be consistent with the principles of sustainable development and therefore do not meet the tests of the NPPF in terms of Plan making.

Paragraph 3.3 of the draft Plan mentions balancing the need for development against its impacts and the positive benefits of achieving this. It also requires that this is tested through the Sustainability Appraisal Report (SA). In the SA at paragraph 5.4.7, the strategic growth sites in West Chelmsford are assessed as having a significant negative effect on SA Objective 14 (landscape) and on SA Objective 12 (waste and resources) due to their location within Minerals Safeguarding Areas. These sites are therefore not delivering the positive benefits required to achieve sustainable development and do have significant impacts, which go against the aspirations of the Plan and national guidance in terms of the delivery of sustainable development.

#### **SP5**

There is overall support for the delivery of new infrastructure and active encouragement for this to be undertaken to ensure the delivery of the right infrastructure in the right places, which will support the nature and level of growth proposed, in order to ensure the delivery of sustainable development. Paragraph

3.14 of the draft Plan recognises that 'ensuring the transport network is sufficient' is one of the most significant challenges of the Strategy and that 'many of the existing roads are at, or near to, capacity'.

The Highways Authority Public Engagement document: 'Chelmsford Future Transport Network: February 2017' highlights the acute transport problems in Chelmsford generally with roads at 96% capacity. It specifically highlights the Broomfield Road Corridor as one of the most congested routes, with congestion levels at even higher levels. Main Road Broomfield (B1008) is therefore well above the desired capacity level and this is before housing agreed through the current North Chelmsford Area Action Plan has been fully implemented. The Chelmsford Future Transport Network document explains that roads should ideally be at less than 90% and refers to the problems for emergency vehicles when congestion is at such high levels. Main Road Broomfield is of course an important access for ambulances.

It is therefore extraordinary that paragraph 3.20 indicates the Infrastructure Delivery Plan (IDP), which will set out the infrastructure which can be and will be delivered in the Plan period to support the level and nature of growth proposed, has yet not been agreed. It is therefore wholly unclear as to how the Plan and the proposals therein can be assessed in terms of robustness and delivery.

It is understood that the IDP is being produced jointly with other neighbouring local authorities, therefore recognised that this will impact the timing of this work. Notwithstanding this, this document and its content in terms of the certainty of delivery of infrastructure is vital to underpinning the deliverability of the development set out in the Plan. The IDP needs to assess the infrastructure requirements of any proposed development strategy, but it also needs to underpin the development approach. It should therefore have been agreed first and then locations for development refined on the basis that they can be supported by the findings of this work. Instead, the opposite seems to have happened in the preparation of this Plan; the sites have been chosen first and the IDP will then be prepared, but in the absence of this, there can be no certainty that these sites can be supported by the infrastructure required.

This is particularly relevant to the development to the North of Chelmsford, where the biggest greenfield development of the Plan is proposed on the basis that it will be underpinned by the necessary infrastructure, in particular the NE Bypass. There is currently no certainty that this vital piece of infrastructure, or any alternative which might fulfil the same or similar purpose of supporting growth in this location, is going to be deliverable within the Plan period. This is a vital omission, which undermines the robustness of this Plan and to which we strongly object.

#### Other Growth Locations

The Preferred Option should also have taken greater account of newly improved infrastructure which is available to support growth (particularly in the absence of evidence of any further infrastructure which may be deliverable in the IDP), such as the A130 south and the new Beaulieu railway station (which is likely to be achieved well before the NE Bypass). Both of these are ready and able to support additional

growth and development around them and as would meet other sustainability and planning policy objectives, therefore these should be given greater consideration in the refinement of the preferred option, particularly in the context of the uncertainty of the delivery of infrastructure to support the growth to the NE of Chelmsford.

## CIL

In addition, in relation to paragraph 3.21, it is unclear as to how the current CIL Charging Schedule takes into account infrastructure investment required to service the new Local Plan. The Plan should make clear the way in which the infrastructure necessary to deliver the growth sought by the Plan will be forward funded. The IDP will doubtless consider this matter, but again, this should be set out within this Plan, alongside an indication of any planned review of the CIL Charging Schedule, which again may be needed to achieve the delivery of infrastructure to facilitate the level and nature of growth set out in the Plan.

Paragraph 3.15 refers to the transport modelling by ECC's consultants Ringway Jacobs, which has been undertaken as part of the evidence base for the draft Plan to support the proposals therein. The North and West Parish Councils Group have commissioned their own transport consultant, Journey Transport Planning, to review the supporting transport modelling documentation and its suitability to inform the option selection process and specifically the selection of the current preferred option. A copy of the report produced by Journey Transport Planning is attached as part of our supporting evidence in response to the Plan.

We have significant concerns as to the robustness of the evidence produced by Ringway Jacobs, in terms of the approach used and the impact of the outcomes as a result. The traffic model used by Ringway Jacobs is a 'link based' model and takes no account of junctions. It provides only a strategic overview of the Chelmsford City area network in terms of link performance, based on theoretical link based capacity. The model predicts certain links across the network will be operating in excess of capacity during the modelled periods but the assessment does not take into account the presence of junctions and bottlenecks within the network. As such, it assumes that all assigned traffic can access the network equally and will only re-assign to alternative routes in response to link congestion based on journey times and congestion.

It is considered that across the network, the principal determinant of capacity is not link based but junction based, and, as such, using a link based model is likely to yield inconclusive results and could lead to inappropriate option allocation. The evidence base in support of the preferred option is therefore not robust and requires further detailed work to be certain that the current preferred option can be delivered in a sustainable manner.

## **SP6**

### Infrastructure delivery

Paragraph 3.24 sets out the way in which the delivery of infrastructure will be important to achieving the delivery of sustainable growth. This requirement is vital.

We have set out concerns in relation to the uncertainty over the delivery of key infrastructure, for example the NE Bypass, in relation to policy SP5. In short, it is vital that the necessary improvements and additional infrastructure is delivered in a timely and suitable manner to support the level and nature of growth intended in the Plan. There is no certainty in this regard for the most costly and strategic infrastructure requirements, such as the NE bypass and on this basis we object to the current preferred option and do not believe that it fulfills the objectives of sustainable development as set at a national level.

## **SP 7**

### Agricultural Land

3.29. The Sustainability Appraisal Report (SA) highlights at paragraph 3.7.9 that the best and most versatile Grade 2 agricultural land lies to the north/west of the Chelmsford Urban Area, whilst land to the south and east of the city is of lower grade (3 or 4) and is better connected to major transport corridors and employment opportunities.

The SA goes on to argue at paragraph 3.7.12 that, without a Local Plan, the Council would have less control over where development takes place which may result in the loss of the best and most versatile agricultural land. It however seems that the growth proposed in the Plan is allowing for significant development on areas of higher grade agricultural land whilst not being clear as to how it is better when the Council are planning for this, as opposed to if it were to come forward on an alternative basis. Either way results in the loss of higher grade agricultural land, where there are options to locate growth in areas of lower grade land.

There is insufficient evidence provided in any of the Local Plan documents to justify the permanent loss of Grade 2 land in the proposed growth locations to the west and north of Chelmsford and there remain options in alternative locations with lower grade land, which would make more sustainable alternatives.

The site allocations set out in the draft Plan do not therefore 'minimise the loss of the best and most versatile agricultural land to ensure future production' (paragraph 3.29) and do not advance overriding 'other planning factors' such as sustainability and general suitability for doing so. The Preferred Option is therefore not the most sustainable option and does not fulfil the Plan's own aspirations in this regard, as set out at paragraph 3.29.

### **Question 2: Do you agree with the Vision? No**

*If you do not agree with the Vision please explain how you would like to see the Vision changed.*

Chelmsford has been highly successful in transforming itself from a manufacturing town very dependent on Cold War defence industries to a more diverse economy with a strong retail and entertainment centre, giving the City a more vibrant and diverse atmosphere. Iconic points in this journey have been the achievement of City status and the opening of the John Lewis store.

The process of regenerating Chelmsford city centre will rightly continue into the new Plan period. But in terms of Vision, this Plan seems to rely upon a Vision which has been largely already achieved and therefore a fresh, more aspirational vision is required for the period 2021 – 36.

City status does not in itself give a clear vision for the future, for many reasons, not least because a 'city' can be any type or size of settlement. The Plan needs to ask and answer the key question of 'What type of City Chelmsford should be' and how it should relate to the surrounding settlements in the wider area.

The Vision should seek to place greater emphasis on sustainable communities and quality of life, alongside ensuring that new settlements are supported by the delivery of infrastructure (including social infrastructure) from the outset. This is consistent with the Strategic Priorities of the Plan and national guidance.

Currently the Plan appears to focus on 'bolting on' new neighbourhoods to the outskirts of the City. This neither achieves sustainable or the best type of growth, nor reflects any clear vision for the City area. There is no evidence that the type of growth being proposed by the Plan will be supported by the necessary infrastructure. Therefore there is no evidence that increased pressure on existing adjacent infrastructure will be avoided. Rather, more stretched lines of communication with the City Centre are likely, exacerbating traffic problems.

While Chelmsford is fortunate to score well against deprivation indices, quality of life issues are still hugely significant for residents. These frequently derive from the consequences of economic success. For instance, the high level of traffic and its impact on communities shows up time and again in local surveys, such as the Broomfield Parish Plan and emerging Neighbourhood Plan, which are a result of a number of factors, including growth in population, economic success and the relatively high cost of public transport compared with private ownership of vehicles.

The opening of the new railway station near the Boreham Interchange in the early 2020s will mark a highly positive 'defining moment' in the early stages of the forthcoming Plan period. In spatial terms, this provides an opportunity to re-invigorate sustainable transport in Chelmsford, with as much housing as possible being located within walking and cycling distance of the new station. This represents a significant opportunity which is not reflected in the Plan or its vision at present.

The Vision for Chelmsford also ignores the contribution made by the rural areas to the quality of life of its residents. The strong sense of community in Chelmsford's villages and hamlets should be acknowledged as an asset that should be nurtured. There is no evidence that Village Design Statements, Parish Plans or even emerging Neighbourhood Plans have been used to guide development in the Local Plan. These represent a community-based, 'ground-up' basis for higher level Vision and provide sound evidence on the aspirations of rural communities, which should be reflected in the Plan.

The Vision should reflect the transition of Chelmsford to a City and seek to build on that designation, whilst reflecting the importance of the surrounding countryside and

communities. At present, the vision appears to see the surrounding areas as a setting for the City, rather than reflect the complex and varied characters and contributions these areas make. The Parish Council would therefore welcome the opportunity to help develop this relationship and the vision needed to achieve it, which is not currently set out in the draft Plan.

**Question 3: Do you agree with the Spatial Principles? No**

*If you do not agree with any of the Spatial Principles please give the reasons for your answer and explain how you would like to see them changed (please specify the Spatial Principle you are referring to in your comments).*

Garden Community Principles

The draft Plan at paragraph 4.12 makes reference to the intention to adopt 'garden community principles' for the delivery of the strategic development allocations. It is not clear why the City Council has decided to adopt the TCPA's garden community principles. Local Plans focus on short delivery horizons whilst garden communities require delivery over a long period of time to allow them to grow organically and allow developers to achieve a return on investment. There are also extensive timescales and processes to be followed to achieve the aspirations of this approach and there is no certainty or clarity that the promoters or owners of the areas required for the delivery of this development are committed to this approach or details of the way in which and the timescales in which it will be pursued, to give certainty that it can be achieved within the target timescales of the Plan for the delivery of these sites.

One of the key points in this guidance relates to the need to work with communities. There should therefore be further communication and consultation with the surrounding communities in this regard to discuss the process and outcomes and to reaffirm whether this is the correct approach in this location and that the aspirations of the Plan can therefore be fulfilled in this regard in the Plan period.

The draft Plan infers that 'garden community principles' can be used for all strategic development locations, regardless of size, type and location. For instance, paragraph 6.34 states that 'new development in North Chelmsford will be based around urban extensions which follow Garden City principles'. Garden Cities require a scale and critical mass to achieve the aspirations in terms of sustainability and other matters, therefore it is unclear as to whether any other than the largest growth location within the Plan would be capable of fulfilling these functions and therefore achieving growth in the context of this process.

Definition should also be provided of the difference in application of Garden Cities and Garden Communities.

The principle of Garden Communities is welcomed, but the Plan needs to set out more specific criteria and detail as to how this will be achieved than is currently included in the draft document.

This further information may include the background research by Professor Robert Tregay, chairman of LDA Design, who has identified five “defining characteristics” of a garden village:

1. The right location;
2. Landscape fit;
3. Character and placemaking;
4. A village way of life; and
5. An enterprising community.

He has stated that the standard model of development for new communities, that is urban extensions piggybacking on existing infrastructure in market towns, is not the best for delivering garden villages. He proposes that there is an alternative model that protects the settings and characteristics of market towns and pushes development out into well-chosen locations.

He also notes that garden villages would have strong transport connections with “higher order settlements” and would likely appear in clusters that shared services such as schools. It was critical that they should function socially and economically like traditional villages. The research also alluded to the level and nature of services needed for certain scales of community, for example, in a given community of 5,000 people, there was a primary and secondary school, a library, a medical centre, 100 community clubs and 250 businesses.

The level of social infrastructure set out in this research alludes to a level of infrastructure provision that would be unlikely to be regarded as viable in a modern development. It is not therefore clear whether the Plan seeks to achieve Garden Settlements in the traditional sense, or whether the vision for new development will be expected to adopt some of the characteristics of Garden Settlements in the context of wider considerations, such as infrastructure provision and viability.

The Plan should also more clearly set out the way in which the City Council will pursue this and intervene to deliver this type of development, alongside developers and communities, as opposed to more traditional development models, if this is the approach they wish to pursue through this Plan.

### Hammonds Farm

In terms of specific sites and opportunities for the delivery of a new Garden Community, the previous consultation on the Plan highlighted the potential of Hammonds Farm to deliver a development of sufficient size to allow for garden community principles, which could be deployed most effectively, including the provision of large tracts of green open space and a green wedge surrounding it.

This site also possesses other positive characteristics, such as its single ownership, which would enable both the pursuit and implementation of Garden Community principles and processes in its delivery.

The exclusion of Hammonds Farm, (apparently at a very late stage of the draft Plan) seems to be partly due to a rather simplistic landscape study of the different zones within the location. Paragraph 6.43, Alternatives Considered, implies that a choice

had to be made between Garden Communities at either SG site 4 or Hammonds Farm. Given the Document's support for Garden Communities, it is unclear why they could not both be included with a corresponding reduction in the number of urban/village extensions (such as SG site 2 and SG site 6), which would still fulfil these wider criteria and we would therefore seek the inclusion of Hammonds Farm in the Plan for the fulfilment of this purpose.

### Protection of the Green Belt

Paragraph 4.13 in relation to the protection of the Green Belt sets out the importance the Government places on the Green Belt. However, this section of the Plan fails to distinguish between the importance of the Green Belt and the possibility (even necessity) of reviewing the function and purpose of Green Belt land through the Local Plan process.

It is noted that the City Council has dismissed a review of the Green Belt on the basis that there are not deemed to be any exceptional circumstances. However, the NPPF makes provision for the review of Green Belt boundaries through the Local Plan process and, although this is not a requirement, the review of the Plan presents a key opportunity, which, if not taken, will potentially be many years before it is again an opportunity (the duration of this Plan period).

Not undertaking a review of the Green Belt at this stage is therefore a significant missed opportunity, which, even if the outcome is that there is no need for a change of the boundaries, should be taken at this time, particularly given the extent of constraint that the Green Belt places on Chelmsford. If not carried out now, such a review could not be undertaken until the preparation of the next plan – probably not for 2 decades.

It is difficult to see how the City Council can comply with the requirements of the NPPF, section 9, especially in terms of understanding and securing the purpose of the Green Belt within its boundaries and the extent to which this is being achieved, without conducting a review. It is unsatisfactory to not conduct a review but still conclude that the aims, purpose and success of Green Belt land is exactly the same as during the previous Plan period, therefore we strongly support a Green Belt review, whatever the outcome, to ensure that a robust Plan making process has been undertaken.

The Issues and Options Document argued that Green Belt boundaries were reviewed in 2012 as part of the current 2001/21 planning period so do not need to be reviewed again. However, not only has time elapsed since that review in 2012, we are now moving into a different planning period during which the City area faces different challenges and opportunities and where more is known about the constraints to growth (such as the timing of infrastructure provision) and the preferred locations for growth. A review should therefore be considered in this changing context. The fact that the review was carried out so late during the past Plan period is not relevant. This review will still be nearly a decade out of date by the start of the new Local Plan period and the context and agenda for growth will have changed and should be reflected by the new Local Plan and its evidence base.



In the current planning period 2001/2021, it was possible to locate significant development on brownfield sites and limit the majority of greenfield development to two new neighbourhoods to the north of Chelmsford (mainly one new neighbourhood in North-East Springfield). Due to those brownfield sites being used up, the new Local Plan will be much more reliant on Green Belt sites and other unprotected rural land, which may well be of higher landscape value. The number of new greenfield locations being proposed in the Preferred Option compared to the previous LDF is an illustration of this new reality after 2021.

It is clear therefore that there is a case for examining the current Green Belt boundaries in order to establish whether there are potential locations within it that would provide more 'sustainable patterns of development' than alternative options outside of the Green Belt, in accordance with paragraph 83 of the NPPF, which also states that the preparation of a new Local Plan is an opportunity to undertake such a review. A review would also help to ensure the permanence of the remaining essential areas of Green Belt, as required by paragraph 79 of the NPPF.

The Parish Council urges the City Council to re-consider its decision to discount development in the Green Belt without conducting a review of the Green Belt. We believe that there are exceptional circumstances for doing so, including the time elapsed since the last review and the changing context in terms of scale and nature of growth and the emerging evidence in relation to infrastructure need and provision (through the IDP).

#### Character of Landscapes – Green Wedges

Paragraph 4.14 of the Plan in relation to the protection of the character of valued landscapes, heritage and biodiversity notes that the Plan will protect valued landscapes through specified priorities, relating to Green Wedges, Green Corridors and the rivers and waterways.

Arguably landscapes and biodiversity in areas of high flood risk enjoy *de facto* protection anyway, so further policy protection is less necessary. Green Wedge designation is more appropriately used for other strategic tracts of landscape quality (i.e. away from river valleys) which are threatened by development. This more flexible approach and a re-definition of Green Wedge boundaries away from river valleys might prevent the need for a further policy designations. For instance:

- Warren Farm provides strategic separation between the village of Writtle and West Chelmsford.
- In Broomfield the landscape that provides separation between the Chelmsford and Broomfield settlement areas (Felsted Field) could merit such designation on both landscape and biodiversity grounds.
- The area separating the villages of Broomfield and Little Waltham could also be protected by green wedge status.

Whilst it is understood that an extensive study of the value of river valleys has been undertaken as part of the Evidence Base and concludes that they have a unique

role, this appears to add little other than identifying that they are river valleys. It is not therefore clear as to why they also need to be identified as Green Wedges or Green Corridors. This process however appears to have been conducted with a much greater degree of depth than the corresponding Landscape Sensitivity and Capacity Assessment, which should be further advanced to identify the merit of any such designations outside of the River Valleys.

Further, the consideration of the extent to which landscapes are valued must also take into account the value placed on them by surrounding communities, which does not form part of the assessment undertaken as part of this Plan preparation. There is no evidence that the evidence base and resulting Plan has taken account of existing Parish Plans, Village Design Statements and Community Landscape Character Assessments in this regard, all of which exist in the north and west of Chelmsford parishes and which have carefully considered the true value of these landscapes to the communities in which they are situated.

It is suggested therefore that this principle should be interpreted more widely and with greater reference to robust and evidenced community plans and assessments, which should be added to the Evidence Base.

### Settlement Hierarchy

Paragraph 4,15 in relation to 'respect for the pattern and hierarchy of existing settlements', states that "the existing settlement pattern should be respected so development does not sprawl into nearby settlements undermining their distinct and separate identities and to prevent more isolated development which is severed or with poor connectivity".

Growth Sites, 2, 4 and 6 of the draft Plan are located in rural parishes, which lie close to the Chelmsford urban edge. They are not however in locations which are connected to the population and community services in the villages of Writtle, Broomfield or Little Waltham which lie nearby, nor are they well connected to established neighbourhoods in west and north Chelmsford. It is therefore unclear as to how this development will relate to the existing settlements, or how it will fulfil the aspirations of the policy objectives.

It is clear that development should be linked to surrounding settlements, being located close to existing facilities and communities, enhancing and sharing these with them and reflecting their characteristics, whilst respecting their individual identity, but it is not clear from the Plan as to how this will be achieved.

The further drafting of the Plan should therefore seek to identify the stages of the process which will ensure that this is achieved in a sustainable and satisfactory manner and in collaboration with the existing surrounding communities to fulfil this aspiration of the Plan.

**Question 4: Do you agree with the Strategic Policies that set out how future development will be accommodated (Policies S2-S15)? No**

*If you do not agree with any of the Strategic Policies please give the reasons for your answer and explain how you would like to see them changed (please specify the Strategic Policy you are referring to in your comments).*

**STRATEGIC POLICY S3 – ADDRESSING CLIMATE CHANGE**

Planning policy, in order to be sustainable, should consider matters relating to the environment, including flood risk. Indeed, paragraph 94 of the NPPF states that, “Local planning authorities should adopt proactive strategies to mitigate and adapt to climate change, taking full account of flood risk, coastal change and water supply and demand considerations”.

The Issues and Options Consultation summary document issued by the City Council states that in their responses to the consultation to the earlier (Issues and Options) stage of Plan preparation, "people expressed concern about the effect on the floodplain, loss of land as soakaway from rainfall, leading to water running down Lordship Road and Cow Watering Lane and Roxwell Brook leading to increased flood risk."

In the current consultation documents, Appendix 3 of the SA includes a grading system for Flood Risk for all sites being considered in the Plan, carried out by Amec Foster Wheeler. In this table, Growth Site 2: West Chelmsford - Warren Farm is in the highest negative band, i.e. this option detracts significantly from the achievement of the objective to minimise flood risk. It is not therefore clear as to how and why this site is being taken forward as a potential development site, when it so strongly contravenes the objectives of the Plan in this regard.

Appendix 7 of the SA deals with Strategic Flood Risk, the assessment of which was undertaken by JBA consulting. This states that Warren Farm would require a Level 2 SFRA assessment if the site is to be taken forward. Given that this requirement is known, in order for this site to be taken forward as a requirement in the Plan to fulfil the growth requirements, it is considered that this further work is undertaken before the next iteration of the Plan to ensure that this site is suitably deliverable within the Plan period. If not, alternative sites which perform better in the SA should be considered for development as an alternative in the Plan period or added as a contingency.

**STRATEGIC POLICY S4 – PROMOTING SOCIAL INCLUSION**

The draft Plan refers in policy S4 to a number of Neighbourhood Plans being in progress in the parishes of Boreham, Broomfield, Danbury, Little Baddow, South Woodham Ferrers and Writtle. These are identified as being vehicles for the delivery of housing and other development required to support the Local Plan.

However, with only one exception, the Document makes no use of neighbourhood planning as an option for achieving growth that is shaped by local communities. Instead, an arbitrary limit of 100 homes (excluding any non-residential) is set,

beyond which a Neighbourhood Plan is considered to have no influence on site location or the distribution pattern for new development in the wider Plan

Table 10 (page 87) suggests that sites over 100 dwellings are considered 'strategic' in their influence and therefore it is only these which are considered. Whilst some very large sites could be defined as strategic as a result of their influence on wider infrastructure, for instance SG Site 4, where it is hoped that specifically located development will help to secure a NE Bypass, this is not the case for most growth sites. It is unclear, for instance, why there are strategic reasons for SG Site 7 (East of Boreham) or SG Site 2 (Warren Farm) to be delivered in the exact locations indicated by the Proposals Maps and why the Neighbourhood Plans underway in those parishes could not be allocated the same quantum of development.

The arbitrary limit of 100 dwellings is not only unnecessary, but is also contrary to DCLG planning practice guidance (6 March 2014) which states: '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.'

Neighbourhood Plans follow a similar process to Local Plans in that they are based on robust evidence and independent examination and indeed must be in accordance with the relevant Local Plan. Therefore there is no 'danger' that genuine strategic considerations will be ignored if left to the neighbourhood planning process, indeed, they must be reflected and will be built upon and enhanced through this process. The active Neighbourhood Plan processes underway in the Chelmsford Area should therefore be given suitable weight and reference in the Local Plan, as for example is done in relation to Danbury, which is to be allowed to allocate sites through its neighbourhood plan as referred to at paragraph 7.196.

The Plan should therefore be amended to allow areas that are undertaking Neighbourhood Plans to allocate development sites for the required quantum of delivery through the Neighbourhood Plan process, subject to an agreed timetable and monitoring process.

## ***STRATEGIC POLICY S5 – CONSERVING AND ENHANCING THE HISTORIC ENVIRONMENT***

Policy S5 sets out the objective of conserving and enhancing the historic environment of the area through the delivery of development in the Plan. There are examples where this has not been given adequate consideration in the allocation of sites for development. In the case of Warren Farm, for example, the Chelmsford Centenary Circle Walk passes through Broomfield to Writtle "along or through fields of flat Essex countryside under wide, open skies, until reaching an ancient bridleway called Lawford Lane, which in 1292 was known as 'the King's Highway', forming part of the original route to London". This path runs through the proposed Growth Site 2 West Chelmsford – Warren Farm which, if developed, would destroy the rural landscape which is an important feature of this section of the walk. Detailed matters such as this have not been given due consideration in the allocation of sites and therefore flexibility should be allowed for in this regard in relation to the Plan and

additional sites or potential be allocated to allow for lower levels of delivery on sites, when they have been subject to further detailed design and have taken into account matters such as this, which are required in order to fulfil the objectives of the Plan.

## ***STRATEGIC POLICY S9 – THE SPATIAL STRATEGY***

### Settlement Hierarchy

It is accepted that new development should be focussed primarily at brownfield sites in the higher order settlements of Chelmsford and South Woodham Ferrers, in the interests of urban regeneration. It is less clear however why further development should follow the settlement hierarchy set out in the Spatial Strategy table, for the following reasons:

- There is no consistent definition of a Key Service Settlement. Each of the Key Service Settlements listed differ in character. All have primary schools (though so do most 'Service Settlements'). Beyond this, there is no consistent pattern to the services offered. For instance, Broomfield hosts a secondary school, but so does Sandon, which is only a 'small settlement'. It is therefore unclear as to how and why this categorisation has been used, as it does not represent a robust basis for development allocations
- New development can offer opportunities to secure new facilities, so there is arguably a stronger case for siting new development away from Key Service Settlements, in order to achieve more facilities to serve both the new development and to enhance the provisions of existing settlements.
- Existing settlements have evolved for historical reasons and may no longer be the most sustainable locations for new development. Small settlements may be situated in locations with better access to current or forthcoming infrastructure, for instance Howe Green (adjacent to the A12 and recently expanded A130) and Sandon (close to the Sandon Park and Ride and A12/A414 junction). These locations, although newer and smaller than other locations may therefore represent the more appropriate locations for sustainable growth and it is not clear that they have been considered in this manner, by using the settlement hierarchy as the means for defining growth locations.
- The proposed Spatial Strategy does not reflect the wider decision not to review the Green Belt boundary. There is reference in the draft policy to the need to consider the Green Belt in the context of site allocations. If this is the case, there must be a case for the need for a holistic Green Belt review, particularly around the Key Service Settlements in order to test the wider Spatial Strategy to ensure it and the resulting locations for growth are robust and correct.

The Parish Council therefore suggests that the distinction between settlement categories 2, 3 and 4 is removed and a greater emphasis is placed on development in sustainable locations where infrastructure already exists or is forthcoming.

## Strategic Growth Locations & Infrastructure

The spatial strategy focusses on the delivery of development on urban land, which is in principle acceptable and in accordance with Government guidance in this regard and in fulfilling sustainable development principles. We have set out our concerns in relation to the Settlement Hierarchy at question 3, in terms of the true integration which will and can be achieved between existing settlements and the pattern of growth as currently proposed. Fundamentally, the Strategic Growth Sites described misleadingly as “Central and Urban Chelmsford” and “North Chelmsford” are in fact all located within rural parishes and do not represent true extensions to these settlements in terms of reflecting their character, integration of community and services.

West Chelmsford - Warren Farm (2) is in Writtle Parish; North of Broomfield (6) straddles Broomfield and Little Waltham Parishes; and, North East Chelmsford (4) lies wholly within Little Waltham Parish. These are all rural locations, which do not form part of the urban area of Chelmsford and which are quite different in terms of character and function.

Paragraph 6.34 notes that the sustainable new growth around north Chelmsford can help to deliver strategic infrastructure including the Chelmsford North East Bypass. There is absolutely no evidence presented in support of this Plan which supports this assertion. There is no certainty at present as to how or when any such bypass may be delivered and it is clear from any evidence available in this regard that this infrastructure is significant, particularly in the context that it is currently anticipated to be pursued through a NSIP process. Again, the timing and certainty of this is unknown or unavailable for comment as part of this process. In the absence of any commitment to funding of the NE Bypass from any other source (either in total or part), it is deemed highly unlikely that the North Chelmsford development could help to deliver this level of strategic infrastructure.

Paragraph 6.36 of the Plan notes that north and east Chelmsford will accommodate a significant amount of the development in Chelmsford in the Plan period and beyond. The smaller allocated sites in North East Chelmsford are phased to be developed in the first 5 years, whilst there is no confirmation as to the timing of delivery of infrastructure that will support such growth or any further growth in this area. There is therefore no certainty that the required infrastructure will be provided in a timely manner, which may preclude or delay the delivery of development in this area of Chelmsford.

We have set out in relation to infrastructure our significant concerns in relation to the impact of the timing of preparation of the IDP. This document and the provisions therein in relation to infrastructure need, its timing and means of delivery are vital in refining the aims and aspirations of this Plan and the growth areas and timing of their delivery. There is therefore too little evidence available at present to assert that development can come forward with the required infrastructure at a particular time, or that development can be responsible for the delivery of significant infrastructure such as the NE Bypass.

### Alternatives: Hammonds Farm

Under the 'Alternatives Considered' at page 73 of the Plan, there is reference to the alternative strategy considered, which included development at Hammonds Farm (Alternative Spatial Strategy – Urban Focus with Growth at Hammonds Farm). Hammonds Farm is well-located in relation to Chelmsford to provide a large satellite settlement, with a range of its own services, whilst being close enough to the City centre to benefit from Chelmsford's facilities. It would also reduce traffic in the City Centre by virtue of easy access to the A12 and enable sustainable commuter travel to the new railway station.

There are considerable merits in the proposed development of Hammonds Farm, which would bring about sustainable development in a positive manner, in the Plan period and which is deliverable without many of the constraints of other sites being considered.

It is therefore difficult to understand the rationale for not including Hammonds Farm given that it is deliverable in terms of providing infrastructure up front, building a range of housing types at the rate of 200 units a year and could be phased as appropriate. We therefore continue to seek the further consideration of this site as a location for growth within the Plan period.

### **STRATEGIC POLICY S10 – DELIVERING HOUSING GROWTH**

Paragraph 6.46 of Policy S10 states that through the policies and proposals of the Local Plan, greenfield releases will need to be masterplanned and supported by necessary infrastructure to ensure they meet housing need but crucially become successful places to live. There have been examples of this being unsuccessful in other cases in the local area over the last Plan period, for example, the NCAAP growth allocation north of Copperfield Road was supposed to be masterplanned so that the separate land parcels were developed coherently and infrastructure co-ordinated. This has not happened and residents in the first phase at Little Hollows have no access on foot/cycle to the community facilities and bus services in the adjoining Newlands Spring residential area.

The new Local Plan should therefore seek to provide greater structure and certainty in this regard to ensure that the necessary masterplans will be produced and that infrastructure will be forward funded for the greenfield sites as required in order to ensure their sustainable and timely delivery as anticipated by the Plan.

### **STRATEGIC POLICY S12 – INFRASTRUCTURE REQUIREMENTS**

#### Modal shift: bus and cycle use

Paragraph 6.56. refers to measures designed to encourage people to make sustainable travel choices. A Sustainability Review was commissioned by Chelmsford City Council (CCC) in recognition of the fact that, regardless of the options and tests carried out, high levels of congestion are forecast across the Chelmsford City network as a result of the growth of the area through the Plan period. This review summarised the 2011 census information for Chelmsford City to identify the potential for forecast



development generated vehicle trips in each location to transfer to sustainable modes.

In terms of bus based accessibility, the Sustainability Review concluded that North Chelmsford, Broomfield and the Chelmsford Urban Area represented the best opportunities to encourage bus use from new developments via existing infrastructure.

The assessment was based on the ease of access to bus services (distance) and the frequency of those services, but it does not provide an accurate review of the quality or reliability of the services available. Many of the services provided do not have specific infrastructure (particularly the services from Broomfield) therefore do not and will not represent an attractive mode for occupiers of new or existing development. Furthermore, the buses will continue to be subject to the same congestion as all other traffic and the potential for improving that situation on the Broomfield Road Corridor is limited by the available highway and the built environment.

Bus services from west Chelmsford are similarly affected, as the potential to provide infrastructure improvements to improve the speed and reliability of the bus services is not available due to the geometry and extent of the highway infrastructure which is in turn limited by the existing built environment.

The sustainability review has identified potential development areas/corridors based on potential improvements to bus services that are not defined or realistically deliverable due to conditions on the ground. It cannot therefore be assumed that future development will be supported by a step change in terms of bus usage.

In terms of cycle accessibility, the review sets out that all areas within 4km of the city centre or trains stations have the potential to increase the mode share by bike and reduce car trips.

The review identifies the existing cycle corridors, based on the green wedges radiating out from the City Centre, and suggests that proposals for improvements to routes from the west of Chelmsford and also from Broomfield would improve that connectivity. As a result of these assumptions, these locations have been identified as being suitable for the location of large scale development.

Again, no detailed evaluation of the deliverability of such proposals has been undertaken and as such it is considered that it would be premature to identify development locations based on potential improvements to transport infrastructure and an assumption as to the extent of modal shift which can be achieved, at least without some assurance of deliverability of the infrastructure which will be needed to support this, particularly as there are some locations, such as the Broomfield Road Corridor and the Roxwell Road corridor, which are likely to provide very significant challenges in terms of implementation and as such cannot be guaranteed in terms of deliverability.

The promotion of areas for development where at present there are identified infrastructure deficiencies represents a premature approach to the identification of appropriate locations for development. Furthermore, there is no evidence to support the assertion that people will not use their cars and switch to using buses or walk or cycle as the solution to mitigating the existing traffic congestion on arteries such as

Broomfield Road, Chignal Road, Essex Regiment Way and the A1060 Roxwell Road. When factors such as the weather, mobility restrictions, carrying heavy shopping, taking several children to several different schools, cross town journeys etc. are brought into play, it is highly likely that people will continue to choose to use their cars.

### North East Bypass

The removal of the North West Relief Road that was proposed in the Issues & Options Document is welcomed, as set out at paragraph 6.58. The North-East Bypass is an essential piece of infrastructure that would bring benefits to the strategic road network, to north-east Chelmsford and north-west Chelmsford. Resources for transport infrastructure improvements should be concentrated on building it.

### Development Options and Infrastructure Planning

We disagree that the aims and objectives of the County Council's vision for Chelmsford's transport system will be supported through the three Growth Areas and allocations identified in the Preferred Options Document, as set out at paragraph 6.62. The transport modelling undertaken by Ringway Jacobs, whilst providing a reasonable estimation of the network performance at a strategic level, is not suitable for the testing of different development options and furthermore has not provided any evidence that the Preferred Option represents the best option in terms of the existing and future highway and transport infrastructure.

The modelling effectively indicates a high level of congestion on key links across the city, similar to that modelled in the previous tests on the 3 Options and as such suggests that sustainability improvements would need to be provided to support the Preferred Option growth locations. Again, it is not clear how these improvements can be delivered or even if they are deliverable at all.

A review of the process to identify Chelmsford City Councils' Preferred Option for growth to 2036 demonstrates that the modelling work undertaken to support the option is insufficiently refined to define accurately, and to identify appropriate growth locations at this stage and more in depth junction based modelling work needs to be undertaken in order to provide data at a sufficiently detailed level to properly inform the development of growth options and locations for Chelmsford.

The modelling process utilised so far is inconclusive and does not appear to support the Preferred Option. In addition, the Preferred Option relies on potentially undeliverable infrastructure improvements that would need to be assessed and evaluated prior to any option being promoted.

### Essex Regiment Way (A130)

The Parish Council notes that severity of congestion at peaks times in Main Road, Broomfield (B1008), especially near the junction with Hospital Approach. The severity is greater here than on Essex Regiment Way (A130), even though that road was originally designed to be a bypass to the Broomfield corridor. Anecdotal evidence suggests that the number of roundabouts on Essex Regiment Way is a major factor in

causing traffic to use the B1008 instead of the A130, which has got worse since a further roundabout was added to serve north-east Chelmsford.

The Broomfield Parish Plan (2005) showed strong community support for improving traffic flows on the A130 to make it more attractive to through traffic. The Parish Council believes that the following minor measures would help to achieve this:

- Sheepcotes Roundabout (junction of A130/A131/B1008).
  - a) Addition of filter lane to enable northbound traffic approaching the roundabout to turn left into the B1008. We suggest this would encourage Hospital traffic from south and east areas of Chelmsford to use the A130, knowing that they could then access the B1008 more easily and approach Broomfield Hospital from the north (rather than approaching from the south through Broomfield village)
  - b) Addition of a filter lane to enable southbound traffic on the A131 to access the A130 Essex Regiment Way more easily, thus making it more attractive compared to the B1008.
- Re-examination of the need for all of the existing roundabouts on Essex Regiment Way and the possibility of re-configuring some to improve traffic flows.
- Given the growing awareness of the need for a safe pedestrian/cycle crossing on the A130, consideration of a fly-over at one of the current roundabouts with the aim of improving traffic flow and pedestrian/cycle connectivity at the same time
- Extension of the dedicated bus lane between the Chelmer Valley Park and Ride and the junction of the A130/A138 (Nabbots Farm Roundabout)

## **STRATEGIC POLICY S13 – SECURING INFRASTRUCTURE**

Strategic Policy S13 asserts that the Council will ensure that new development will be supported by necessary infrastructure, services and facilities. At paragraph 6.67, there is reference to the Infrastructure Delivery Plan, which will assess the infrastructure available and identify the infrastructure needed to facilitate growth through the Plan. It also notes that this document will not be produced until the consultation on the Pre-Submission Local Plan. This is a key document which should have informed the Preferred Options. It is unclear as to how the Council can progress with options for growth without certainty that the infrastructure needed to deliver this growth either exists or can be delivered in a timely manner.

The additional transport modelling work in relation to the need for additional transport infrastructure will not be completed until the Pre-Submission stage. There is no certainty as to what this will show in terms of infrastructure requirement, however it is widely recognised that the NE Bypass will form a key requirement in order to facilitate growth in the NE Chelmsford area as envisaged by the Plan. In this particular regard, there is no indication that funding will be forthcoming from the Government or other sources for key transport improvements such as the NE Bypass and without any such certainty in terms of delivery, the Plan needs to be considering alternative growth options until this matter has been resolved or alternatives need to continue to be presented in the Plan, in the event that this infrastructure and the associated growth cannot be delivered in the Plan period.

## **STRATEGIC POLICY S14 – THE ROLE OF THE COUNTRYSIDE**

Paragraph 6.71 states that development will be supported in the Rural Area provided it does not adversely impact the identified intrinsic character and beauty and complies with other relevant policies of the Local Plan.

The built up area of Chelmsford along its western edge is well-defined. There is a clear visual division between the long established Chignal Estate and the open arable fields of Warren Farm in Writtle Parish: a significant rural section of the Chelmsford Centenary Circular Walk passes through this proposed growth location. In addition to very real concerns that the Parish Council has about the traffic that would be generated on already congested roads by building 800 homes at Warren Farm, we would not wish to see the open landscape character of the rural Parishes to the west of the City destroyed by large scale urbanisation.

**Question 5: Do you agree with the Site Allocation Policies that set out where future development growth will be focused (Policies GR1, CW1a-1f, SGS1a-1g, GS1h-1s, GS9-10, OS1a-1c, SGS2-8, EC1-4, TS1 and SPA1-6)? No**

*If you do not agree with any of the Site Allocation Policies please give the reasons for your answer and explain how you would like to see them changed (please specify the Site Allocation Policy you are referring to in your comments)*

The Parish Council agrees with the following Site Allocation Policies: GR 1a – s, 3a, b, c; 7; 8; 9; 10; OS1a-c; EC1; EC4; CW1a-f; SGS1a-g; GS1h-s; SGS 3a,b,c; 7; 8; 9; 10.

The Parish Council disagrees/objects to the following Site Allocation Policies: GR 2, 4, 5, 6; EC2; EC3 unless the inclusion of the new expanded primary school can be guaranteed; SGS 2, 4, 5, 6.

The Parish Council objects strongly to the Site Allocation Policies for Locations 2 (Warren Farm); 4 (North East Chelmsford) and 6 (N of Broomfield). These locations are not sustainable and do not comply with the Strategic Priorities, Spatial Principles or Strategic Policies. The existing roads serving these sites are near to capacity and development should not take place on sites where the existing road system will not be able to cope with the increased traffic generated. Good transportation

infrastructure already exists to the East of Chelmsford along the A12/A130 corridor and this will be enhanced significantly by improvements to the A12, adding a third carriageway to the A130, by the construction of the NE By-pass and the new rail station at Beaulieu Park. The most appropriate location for growth is close to this infrastructure.

**Site 2 West Chelmsford – Warren Farm**, located in Writtle Parish, is not considered to be a sustainable location for growth for the following reasons:

- Increased traffic generation – there is no evidence to justify the assumptions of the Traffic Modelling that bus priority measures and encouraging people to walk and cycle will solve the problems of an infrastructure that is at or close to capacity, particularly at junctions and on the A1060, Lordship Lane and Chignal Road. The A1060 from the junction with Chignal Road and the city centre is too narrow to allow bus only lanes.
- The site is not connected to the cycle and walking path that runs along the River Can to Chelmsford - this would entail crossing the busy A1060. The assumed modal shift to walking and cycling cannot therefore be assumed to be achievable.
- Landscape sensitivity – there is an established clear separation of the urban/rural boundary , which will be compromised by this development.
- Loss of Grade 2 best quality agricultural land
- Mineral safeguarding area – gravel would have to be extracted before development. The Plan should identify a timescale for this mineral extraction in accordance with the Essex Minerals Plan, to provide context for the timing of development. Flooding concerns
- Impact on the Chignal Estate, e.g. bus route through Avon Road
- Impact on health services, e.g. pressure on Doctors surgery in Writtle
- The likelihood of further large scale development on this greenfield site to the north and west as proposed in the Issues & Options Document.
- The Sustainability Appraisal Report Appendix I p.118 comments that whilst an appropriate landscaped edge would be required to mitigate the visual impact of the development, in view of the scale of development and loss of greenfield land, effects on landscape and townscape are still considered to be significant.

**Site 4 North East Chelmsford** – located in the Little Waltham Parish, is not considered to be a sustainable location for growth for the following reasons:

1. Increased traffic generation – there is no evidence to justify the assumptions of the Traffic Modelling that bus priority measures and encouraging people to walk and cycle will solve the problems of an infrastructure that is at or close to capacity.

2. The site is not connected to any footpaths or cycle ways. Essex Regiment Way is not a suitable road for pedestrians. The assumed modal shift to walking and cycling cannot therefore be assumed to be achievable.
3. Landscape sensitivity – there is an established clear separation of the urban/rural boundary, which will be compromised by this development.
4. Mineral safeguarding area – gravel would have to be extracted before development. The Plan should identify a timescale for this mineral extraction in accordance with the Essex Minerals Plan, to provide context for the timing of development.
5. Flooding concerns, in that a substantial area of large soak away will be lost, with detrimental effects to the village which lies to the south of the development.
6. Impact on the village of Little Waltham, as a result of congested roads it would be become a rat-run for traffic seeking alternative routes into Chelmsford.
7. Impact on health services and schools, e.g. pressure on Doctors surgery in Little Waltham and the primary school. The Plan should identify the infrastructure required to support this level of development. The provision of another Travellers Site and the impact that it will have on under-pressure services (education and health) on the parish. The additional infrastructure requirements generated by this allocation should be identified in the Plan.

**Site 6 – North of Broomfield** – located in Little Waltham and Broomfield Parishes, is not considered to be a sustainable location for growth for the following reasons, many of which relate to highways and infrastructure provision, again emphasising the considerable need for the IDP to be produced in order to refine the growth assumptions of this Plan, as set out elsewhere in our representations:

- The Ringway Jacobs Traffic modelling does not include the impact on junctions, therefore, the benefit of a second access to the Broomfield Hospital proposed in this Growth Site for the B1008 cannot be quantified until the further study on junctions has taken place.
- The B1008 is one of the most congested roads in Chelmsford and the addition of this level of additional traffic would be unacceptable.
- The proposed development and increase in traffic would be likely to increase rat-running through the village of Little Waltham by traffic wishing to travel south-east on Essex Regiment Way in the morning peaks (and returning in the evening peak). This would result in highways safety considerations and impact the character of the existing settlement.
- 
- The site is located around 3 miles from the City Centre therefore the reliance on significant 'direct pedestrian access to the City Centre' (bullet point 10) is unrealistic assumption for daily use and commuting.
- 
- Cycle use is also unlikely as there is no safe cycle path from Chelmsford beyond Valley Bridge, necessitating cyclists to use the narrow and highly

congested sections of Main Road, Broomfield and there is no proposed improvement to this infrastructure in the Plan to support this assertion as to increase in such use.

- There is no evidence or strong proposal in terms of infrastructure improvement to support the anticipated modal shift from car use, which is therefore likely to remain the preferred mode of transport in the area.
- In terms of improvements to the highways to facilitate car use, an additional access from Woodhouse Lane and North Court Road would not be appropriate due to the narrowness of these country roads. Closure of some sections would need to be considered and the vehicle access to the network would need to be exclusively from Blasford Hill
- The document is overly optimistic about the extent to which a neighbourhood centre and community focus could be created. Convenience shops are already located at Broomfield Hospital, as is a childcare nursery, so competing facilities within the site are unlikely to be viable. Culturally and in terms of community, the development would be an extra 'onion layer' and would most likely be focussed on the Hospital area. [I have commented on this paragraph and the below elsewhere]
- In particular, the Parish Council are concerned that a new one-form entry primary school would not be viable in the longer-term once family demography had settled down – it should be noted that the Education Authority's policy is to prefer new primary schools to be 2 forms of entry. The Parish Council is concerned that a new small school in this location could divert focus and resources from the overdue expansion of Broomfield Primary School.
- At the very least, primary school provision would need very careful analysis, given the closeness of existing schools in Broomfield, Little Waltham and Great Waltham. All 3 of these schools help to create a coherent community focus to their respective villages, enabling friendship groupings to develop across a whole village community. In turn, this feeds into other activities (such as Scouts, Guides, youth activities) that tend to be organised on a village-wide basis. The Parish Council strongly believes that the existing primary school structure should be retained and re-inforced; and that it would be detrimental to create a small 1 form entry primary school in this remote location, as this would hinder the existing more coherent community focus in each of the 3 villages.

### **Existing Commitment EC3 – Land to the South and West of Broomfield Place and Broomfield Primary School (in the Parish of Broomfield)**

This site is contained in the current North Chelmsford Area Action Plan (NCAAP), where its rationale is that it would include a new site for Broomfield Primary School as a 2 form entry primary school. Potentially this could also provide for better management of traffic around school start and finish times.

However, it has so far proved impossible for the Education Authority and the developers to agree arrangements for rebuilding the school as promised in the NCAAP. Therefore before it can be agreed to carry forward the site into the next Local Plan, a robust, costed and achievable plan for building the School must be agreed.

Without a new school, Broomfield Primary School would remain in its current unsatisfactory buildings separated from its playing fields by the busy School Lane. It is currently unable to admit all children in Broomfield village, and the addition of an extra 200+ houses would clearly exacerbate the problem further.

School Lane is a busy road and is particularly congested at School start and finish times. The NCAAP already requires the re-modelling of the Main Road/School Lane junction at Angel Green if this development goes ahead. It would be clearly unacceptable for the development to proceed without the relocation of the School, since the benefit of better access arrangements to the School site would not be achieved.

Therefore, in the absence of a robust, costed and achievable plan for relocating the School, the Parish Council does not agree that this existing commitment site be carried forward.

### **Policy SPA1 – Broomfield Hospital Special Policy Area**

Much of Policy SPA1 is supported, particularly the policies of concentrating buildings of scale and mass within the central core of the estate and limiting the scale and mass of buildings at the edge of the estate. However, the final sentence referring to the provision of a new access road to the B1008 is premature, as the development proposals referred to are still the subject of Local Plan consultation. We suggest that this sentence is made conditional or removed altogether.

### **Question 6: Do you agree with the other Local Plan Policies that cover housing, employment, the environment and design (Policies HO1-3, EM1-2 etc.)? Y/N**

*If you do not agree with any of the other Local Plan Policies please give the reasons for your answer and explain how you would like to see them changed (please specify the Policy you are referring to in your comments).*

No comments



**Question 7: Do you agree with or have any comments on the Proposals Maps? (Chelmsford North, Chelmsford South, Map 1 -35)? No**

*Please provide your comments. If you do not agree with any of the Maps please give the reasons for your answer and explain how you would like to see them changed (please specify the Map you are referring to in your comments).*

The Parish Council does not agree with the Proposals Maps 1 & 8. Map 1 shows proposed development at Site 2 Warren Farm and Site 4 North East Chelmsford ; Map 8 shows development North of Broomfield: our previous comments under Question 5 apply.

In addition, the Defined Settlement boundary map for Broomfield shows Existing Commitment site 3 as being within the Broomfield Defined Settlement already. As this is still subject to consultation for the new Local Plan, this is felt to be inappropriate. We request that it is removed.

**Question 8: Do you have any comments on other sections of the Preferred Options Consultation Document and its supporting Evidence Base?**

*Please provide your comments. If you do not agree with something please give the reasons for your answer and explain how you would like to see them changed (please specify the Section/Appendix you are referring to in your comments).*

**Evidence Base – Issues and Options Consultation Document ‘You Said, We Did’**

The Parish Council strongly welcomes in Q24 the recognition of the deep concerns raised about a Western Relief Road and the subsequent decision to remove it from the Plan.

However, the summary of responses to Q20 is somewhat misleading. It is not the case that Option 1 was favoured. None of the Options were favoured. The Issues and Options Feedback Report June 2016 reveals that only 108 responses from the public favoured Option 1, 53 selected no option, but by far the biggest group 541 of public respondents consciously selected ‘None of the above’. It is felt that the comment in the summary 20 that ‘the majority did not support any of the Options’ does not reflect the decisiveness of this verdict.

Similarly, the summary of responses to Q22 is somewhat misleading. A clear pattern of support emerged for locations along the A12/A130 south corridor, a coherent ‘fourth option’ which the North and West Parishes Group has urged in its Issues and Options Consultation Response, but which has not been included in the Preferred Option.

LOCATION	DESCRIPTION	SUPPORT	OPPOSE
1	Chelmsford Urban Area	466	55
2	West Chelmsford	93	551
3	N Chelmsford (Broomfield)	76	544
4	North East Chelmsford	301	201
5	E Chelmsford (E of Gt Baddow)	437	62

<b>6</b>	North SWF	482	38
<b>7</b>	Great Leighs	207	291
<b>8</b>	Howe Green	267	211
<b>9</b>	Rettendon Place	310	165
<b>10</b>	Boreham	445	104
<b>11</b>	Danbury	333	126
<b>12</b>	Bicknacre	340	109
<b>13</b>	Ford End	78	388
<b>14</b>	Great Waltham	41	518
<b>15</b>	Little Waltham	24	527
<b>16</b>	East Hanningfield	247	194
<b>17</b>	Woodham Ferrers	301	165

Whilst it is appreciated that such consultation is a not referendum, nonetheless a clear 'broad brush' spatial picture did emerge. The summary does not provide evidence to show how responses 'reflected the location of the respondent' and it is felt to be rather dismissive of the views of members of the public. It is therefore contrary to the spirit of the City Council's Statement of Community Involvement, paragraph 2.6 which undertakes to encourage members of the public to become involved at any stage.

Further in the summary of Q22, the statement that 'these comments were helpful in selecting the Preferred Option' appears to be at odds with the fact the locations preferred by the public at Howe Green and Rettendon have not been selected or (as at Boreham) only to a limited degree.

Q30. The response states that community-led documents such as Village Design Statements (VDSs) and Parish Plans are part of the Evidence Base, but they do not appear to be listed. We request that the Broomfield VDS, Parish Plans and Community Landscape Character Statement for Broomfield Parish are added to the Evidence Base.