

# **BROOMFIELD PARISH COUNCIL**

## **CONSULTATION RESPONSE TO BLOOR HOMES MASTERPLAN APPLICATION 20/00001/MAS**

**February 2020**

### **1. Introduction**

Broomfield Parish Council ('the Council') has commented at various stages in the evolution of this masterplan either directly or, more generally, by making available the growing evidence base of the emerging Neighbourhood Plan. This has aimed to ensure that the masterplan is informed by the wishes and aspiration of this community and by technical work that relates very specifically to the Parish.

The Council is grateful for aspects of the masterplan that have evolved in the light of such input, for instance the decision to reduce SGS6 from 800 to 450 dwellings. For the sake of brevity, this response will address only areas of remaining concern or outstanding issues that will be considered at a later stage (e.g. through later planning applications).

As SGS6 falls within 2 parishes, a memorandum of understanding was agreed with Little Waltham Parish Council. This was sent to Chelmsford City Council (CCC) and Bloor Homes to ensure that all stakeholders receive a consistent message from the wider community that will be affected by the development of SGS6. For ease of reference, it is attached again at Annexe A of this response.

### **2. Broomfield Neighbourhood Plan (NP)**

The Local Plan Pre-Submission Document (PSD) states that:

*There is an emerging Neighbourhood Plan being prepared in Broomfield which it is envisaged will help shape this site allocation. (para. 7.285)*

The emerging NP is following behind the emerging Local Plan (LP) in that it has yet to undergo formal consultation and examination. We envisage these formal stages taking place in the next 6 – 18 months, with a view to adoption in mid-2021. Given the timescales envisaged in the Masterplan Framework Document (MFD), it is likely that planning applications relating to the Broomfield portion of SGS6 will be determined by reference to the NP.

Where relevant, this response outlines emerging policy aims of the NP and the evidence base behind them, so that the masterplan can:

- a) Be evolved to avoid any conflict with the NP at later stages: as well as
- b) Place due weight on the technical and professional studies in the evidence base of this emerging statutory plan; and
- c) Reflect the views of the local community, as seen in the response to the NP Residents' Questionnaire.

The MFD contains a brief reference to the Broomfield NP (page 9) but does not appear to give recognition to the emerging NP Evidence Base. Whilst the Council appreciates that the NP itself has yet to be subjected to formal consultation and examination, the evidence base should be given weight – in a similar way to the Local Plan evidence base at earlier stages of that process. The NP Landscape Appraisal is particularly relevant to SGS6 as it examines the site in greater detail than any of the higher-level landscape assessments

used to inform the Local Plan. It should be specifically included in the 'Landscape and Visual' section on page 13.

Overall, the MFD would be stronger if it gave weight to the conclusions of the NP Landscape Appraisal and other documents in the NP Evidence Base. The Council recommends amending the MFD to this effect.

All documents in the NP Evidence Base can be accessed at: [www.broomfieldsex.co.uk/np](http://www.broomfieldsex.co.uk/np)

### 3. New Access Road to Broomfield Hospital

PSD, Policy SGS6 and several paragraphs in the Reasoned Justification make clear that the new access road is an integral part of SGS6. For instance (text emboldened for emphasis):

*The site **will** 'Provide a new vehicular access road to serve the development and provide access to Broomfield Hospital and Farleigh Hospice.'* (SGS6, Movement and Access))

*The development **will** provide a multi secondary purpose link road into Broomfield Hospital campus (para 7.287).*

*The delivery of the new access road into Broomfield Hospital is a **strategic objective** of the Local Plan.(para 7.287).*

It is clear, therefore that the link road is not an optional extra but an integral part of SGS6. The development should not and cannot go ahead without it.

By contrast, the MFD is rather vague and equivocal about the achievement of this link. The Indicative Landscape Framework (and other diagrams) indicate the spine road stopping short of Woodhouse Lane, with no connection into the Hospital site. The text contains a number of references to the link being 'facilitated' by the development rather than delivered.

The Council appreciates the difficulty for CCC in encouraging different partners to work together to achieve this policy aim. To this end, CCC has secured a Memorandum of Understanding with the various parties. Ultimately, however, this strategic aim cannot be achieved by this MFD as it stands. Therefore, it cannot be approved in its current state – it must indicate how this strategic aim of SGS6 will be achieved.

Further, the improvements to Woodhouse Lane required in PSD para. 7.288 cannot be achieved unless the spine road connects with Woodhouse lane (the Council understands it does not in the MFD). PSD requires that:

*'The rural lane network to the south of the site is unfit for heavy traffic and measures to prevent intensification of use **must** be delivered ..'* (Para. 7.288)

Although the MFD discusses the options for achieving this, it is not clear that any of them will be delivered.

### 4. General Traffic Reduction on the B1008

PSD para. 7.287 states that:

*'It (the new link road or possibly SGS6 itself) will also help to ease wider congestion on the Main Road, Broomfield corridor.'*

Para 7.288 states that mitigation will include:

*'appropriate road and junction alterations, improvements along the B1008'*

and notes that:

*'The rural lane network to the south of the site is unfit for heavy traffic and measures to prevent intensification of use must be delivered as part of the development.'*

Apart from the insertion of the roundabout needed to access the site, the MFD contains no such information about road alterations or improvements along the B1008 and how they will be delivered. Further, while it asserts that it will encourage sustainable transport (e.g. by linking to cycle path networks), this is to part mitigate the impact of the development itself. It does not explain how:

*'It will also help to ease wider congestion on the Main Road, Broomfield corridor.'* (PSD, Para 2.287)

Traffic is a major concern on the B1008. Studies for the LP by Essex County Council/Ringway Jacobs indicate that the B1008 is already operating at 96% capacity and sections are among the most congested routes in Chelmsford.

Capacity improvements at the junction of Hospital Approach and the B1008 Main Road have not been carried out (despite being required by Section 278 since c. 2005). The Council now requests that these planned improvements are re-examined in the light of the new Hospital access link; and that the expenditure is re-allocated to more effective measures to reduce traffic impact on this section of the B1008.

The TTHC report was commissioned by the Council and neighbouring parish councils. It can be accessed at <https://www.broomfieldessex.co.uk/wp-content/uploads/2018/03/M18013-01C-Transport-Report.pdf>. It indicates that while the new Hospital link road should reduce traffic problems north of Hospital Approach, SGS6 will inevitably increase problems southward of that junction. The junction of School Lane and Main Road is a particular problem, as it is already over capacity even before planned growth in North Chelmsford (para.8.9). The TTHC report indicates an 8-10% increase on 2036 levels on the B1008 due to SGS6 (para. 8.6).

The MFD does not indicate how this general impact on the B1008 will be mitigated and there are no indications of any improvements to the B1008. Without these the MFD cannot be approved as it does not address the aims of the LP.

## **5. Nature of the Hospital Link**

The TTHC report assumed that the new link road would be multi-functional and that Hospital-related traffic from the north would therefore divert to the new access road in preference to using Hospital Approach.

At the LP Examination in Public in 2018, it was announced that the new link would be restricted to certain types of user (primarily Hospital staff). This was announced without consultation or any supporting data. So the Council has no reason to believe that this is the most effective way of *'easing congestion on the Main Road, Broomfield corridor'* compared to all Hospital traffic (staff, patients and visitors) being able to use the new link.

This is not primarily a matter for Bloor Homes, which has already indicated a roundabout junction on Blasford Hill of sufficient capacity to include Hospital traffic. However, CCC does have the responsibility of ensuring that development meets the requirements of the LP. It cannot therefore approve the MFD without further work to quantify and consult on the most appropriate nature of the Hospital link.

## 6. Access to Bus Routes and Distribution of Housing across the Site

There are a number of references in the MFD to the development being serviced by bus operators. However, these admit there is no certainty that bus routes will be varied to service SGS6.

At the LP Examination in Public in 2018, CCC, Essex County Council and First – the major Bus Operator within the City – agreed that, subject to certain conditions:

*'schemes in excess of 500 dwellings located close to existing routes should be able to support on a lasting basis diversions and extensions to services ..' (Chelmsford Local Plan Statement of Common Ground - Provision of Bus Services for the Allocated Sites within the Local Plan, Para. 1.14)*

Therefore, it is unlikely that SGS6 will attract a bus route diversion through the development either in the long or short terms. Instead, it seems likely that the closest bus access points will remain along the B1008 Blasford Hill and at the main entrance to Broomfield Hospital.

The MFD indicates that the east of the site (closer to the B1008) will contain less development than the west. The north-west section of the site is the furthest from existing bus stops (700 metres from the B1008 and 800 metres from Broomfield Hospital main entrance). The Council is concerned that this pattern of development will increase the use of private cars, as residents are unlikely to walk 700 – 800 metres to access a bus. This would compound the fact that bus services to the City Centre, while frequent, are very expensive for anyone who is not entitled to free bus travel.

The Council therefore believes that the MFD should contain provision for denser development in the north-east of the site (i.e. not adjoining the existing residential properties on Blasford Hill). This could be achieved by introducing a higher proportion of apartments for the over 60s to the east and north-east of the main water feature (see Map A). This would ensure that the residents most likely to enjoy free bus travel could access it easily, thereby reducing the likelihood of private car use.

The Council believes that apartments of this kind do not need to create an urban feel, despite the greater density. Broomfield benefits from several minor stately homes/large historic houses and these provide an architectural model for carefully designed blocks of apartments for retired people. Little Orchards in Main Road, Broomfield is an example of an attractive large house that has been tastefully adapted and extended to provide about 25 apartments for the over 55s. Just 6 such buildings would provide a third of the allocated number of dwellings in SGS6.

This change would also enable a reduction in the density of development in the least accessible part of the site – the north-west – which in turn would create more space for landscape mitigation (see section 7 below). This is particularly important as the north-west is the highest part of the site and therefore the most visible when seen from across the river valley to the east.

## 7. Landscape Mitigation

PSD Policy SGS6 stipulates that the development must be *'a high-quality landscape-led development'* which should *'mitigate the visual impact of the development'* and *'create a network of green infrastructure'*.

In the supporting Reasoned Justification, para 7.291 requires *'compensation measures for landscape impact.'* These will include *'lower building densities, appropriate tree and hedge planting along countryside edges, and green buffers'*. It is clear therefore that the green buffers are in addition to the normal tree and hedge planting along countryside edges.

Para. 7.292 specifically notes the need for a Green Buffer *'to protect the amenity of (inter alia) the KEGS playing fields'*. The MFD notes that this boundary has no protecting vegetation or hedgerow – it currently

does not need them. It is therefore particularly vulnerable to adverse *'visual impact of the development'*. So is the adjoining countryside and neighbouring properties to the west, as the land continues to rise towards Partridge Green. The MFD, the NP Landscape Appraisal and the NP Residents' Questionnaire Summary all note the importance of views from this higher land, looking eastwards into the site. The Landscape Appraisal draws attention to the *'rural character of the Pleshey Plateau which is sensitive to visual intrusion from development including night lighting'*. And it notes that:

*'Development in the western part of the site has the potential to introduce a new built edge and perceptions of development extending into the Pleshey Plateau landscape and out of the Chelmer Valley which is uncharacteristic ..'* (page 41)

The NP Landscape Appraisal proposes as mitigation:

*'Extension of Sparrowhawk Wood and Pudding Wood to provide a stronger landscape framework to the west of the site and connect these areas of woodland through linear planting.'* (page 40, Mitigation).

This gives a specific local interpretation re-enforcement to para. 7.291 of the PSD which states:

*'The nature conservation value of Puddings Wood Local Wildlife Site to the south of the development must be considered and form part of a strategic approach to conserving the natural environment and mitigating the impacts of development. Where the new link road affects Puddings Wood, compensatory measures which replaces and provides additional net habitat must be provided as part of the new development.'*

The Council has therefore proposed that a woodland belt should be created from Puddings Wood, along the northern edge of Woodhouse Lane and the western edge of SGS6, towards Sparrowhawk Wood, as indicated in Map A. The Council is investigating the aspiration of extending this belt across the western edge of the adjoining field between SGS6 and Sparrowhawk Wood, to create a woodland wildlife corridor joining up Puddings and Sparrowhawk Woods.

On the western edge of the SGS6, the woodland belt/green buffer would need to be 40-50 metres thick to provide cover in winter. For comparison, existing tree cover in Long Shapley Belt (southern edge of the Hospital site) is 20-30 metres thick and is insufficient to provide cover in winter, as the following photos show:



The MFD initially appears to address this important issue, stating:

*'There is an opportunity to enhance the boundary planting, for example along the western boundary which is mostly open at present, the northern boundary to limit long range views and the south to buffer the rural lane character (page 18).'*

*'Additional planting will be added around the periphery of the Site, including the south and south west boundaries which will provide new ecological connection between Puddings Wood and Sparrowhawk Wood and act as a transition with the surrounding open landscape and soften views from the adjoining countryside and public rights of way' (page 32)*

And:

*'Planting to the western boundary provides the opportunity to create a habitat corridor linking Puddings Wood to the south with Sparrow Hawk Wood to the north (page 19).'*

But these good intentions completely fail to materialize in the Indicative Masterplan diagram (page 31) and throughout the MFD generally. Boundary planting currently shown on the northern and western countryside edges appears patchy and completely insufficient to meet these requirements.

There are several ways this can be rectified:

1. The green margins around these edges mostly appear to be around 40-50m, so tree cover could be extended across the whole margin (though these would leave no space for other aspects of the green margin, so is far from ideal by itself)
2. The westernmost housing block could be rotated slightly to the east (as shown on Map A). This would reduce the size of the north/south green corridor shown as leading to the smaller western village green. This corridor may be of limited value for wildlife as it is a cul-de-sac; a thicker robust woodland belt around the edge of SGS6 may be of greater value.
3. Relocate some housing to the eastern part of the site, as proposed in section 6 above and on Map A, where residents would be closer to bus routes along the B1008. As shown on Map A, there may also be some scope for extending part of the residential block south of the central water feature, as this part of the site is already well provided with green space.
4. Reduce the overall number of dwellings.

These suggestions could be used in combination.

Finally, it has been agreed that the draft NP should contain a policy requiring new developments in excess of 200 dwellings to be screened by woodland belts of 40-50m, where they abut the open countryside. Whilst this still has to be tested through formal consultation and examination, it is supported by the relevant evidence documents, so the Council believes it will be supported in the formal stages of the NP.

For all these reasons, the Council requests the introduction of a woodland belt as described above and shown on Map A.

The NP Landscape Appraisal can be accessed at: [www.broomfieldsex.co.uk/np](http://www.broomfieldsex.co.uk/np)

## **8. Woodhouse Lane ('the Lane') – Highway Improvement Options**

After consultation with some of the residents, the Council proposes the following closure points, as shown on Map B:

1. Junction of the Lane with the B1008 Blasford Hill – this junction has poor visibility, so closure at this point is merited anyway
2. Just east of the junction of the Lane with the proposed new spine/link road.

So, Farleigh Hospice, the properties in North Court Road and the eastern section of the Lane would be accessed from Hospital Approach/North Court Road. Properties in Partridge Green and the western part of the Lane would be accessed from the spine road.

## **Management**

The closed sections of the Lane should be evolved into attractive walking and cycling routes. This may require some additional hedge/tree planting to promote a rural ambience. Barriers should be farm-gate style, rather than concrete bollards.

Most importantly, closed sections of the Lane must not be allowed to become free parking lots for Hospital-related or other vehicles. Any sections of Lane that are not needed for access to properties should be gated at both ends to prevent vehicular access for unauthorized parking, fly tipping etc.

The Council's proposals are indicated on Map B.

## **9. Indicative Character and Focus Areas**

The Council supports the basic characterisation, but subject to the following points:

### **a) Potential 4<sup>th</sup> character area – 'Eastern Edge'**

As outlined in Sections 6 and 7 above and on Map A, the eastern fringes of all 3 character areas could potentially accommodate higher densities by focusing on well-designed, high-quality apartments for the over 60s. These could be modelled on the architectural style of the larger residences which are a historic pattern in the area (for instance, Wood House itself; and Brooklands, Broomfield Place, Butlers and Ayletts, which are all adjacent to Main Road, Broomfield). This would increase the number of people living close to the bus-routes on Blasford Hill, as well as enabling a reduction in development on the higher, more visible western section of the site. That may potentially require a fourth character area.

### **b) 'Opportunity to reflect local style'**

A photo on page 38 bears this caption. The Council believes the **whole** development should reflect a range of local styles and should avoid standard estate housing that could be found anywhere in south-east England

### **c) Broomfield Village Design Statement (VDS) and NP Design Code**

To this end, the Council draws attention to its existing VDS, adopted Supplementary Planning Guidance, and the emerging NP Design Code, which will be published shortly.

### **d) Countryside Edge (page 43)**

The photos on page 43 suggest a fairly standard 'executive home' design simply 'spread out a bit more'. Likewise the sketches (though without much evidence of 'spreading out'!). This is the wrong approach.

The NP Landscape Appraisal states:

*'Where development on the edge of the site is visible it should reflect the characteristic pattern of settlement i.e. include a loose, low density arrangement of dwellings and farm style buildings' (page 41)*

Therefore, as design proposals are refined, the Council would like to see a more imaginative response to the countryside edge, based on farm style buildings and nearby vernacular style buildings, such as those on Blasford Hill and around Wood House.

As indicated in Section 7 of this response, the Council strongly believes that trees and hedgerows on the countryside edge must be much more substantial than those shown on page 43 and (in relation to the Woodhouse Lane boundary) on page 41.

#### **e) Small areas of green space**

The Council recommends that all areas of green space are designed with a clear purpose. This is to avoid problems in recent housing developments in Broomfield where the purpose and acceptable use of spaces has been unclear, leading to a degree of conflict. For instance, older children and teenagers may want to use small areas for ball games, whilst adults may think they are for the use of pre-school children and their parents/carers.

#### **f) Housing Need**

The NP Housing Needs Assessment (HNA) has recommended a housing mix that promotes a greater element of 1 to 3 bedroom homes, including homes for the active retired and bungalows. The HNA can be accessed at: [www.broomfieldessex.co.uk/np](http://www.broomfieldessex.co.uk/np)

It has been agreed that the draft NP should contain policies to achieve the housing mix recommended by the HNA. This view is broadly shared by Little Waltham Parish Council, so it makes sense to apply these recommendations to the whole of SGS6.

The Council recognizes that the specific mix of dwellings will be addressed at later stages of the planning process. However, it is important that the masterplan and its character areas are sufficiently flexible to meet the requirements of the NP when it is adopted.

### **10. Factual Clarifications**

The Council notes a number of statements in the MFD that require clarification or correction:

The Council would contest the general assertion on page 10 that *'the Site is well served by existing services and facilities in Broomfield ...'* specifically for the following reasons:

#### Recreation and Open Space:

*'There are a number of cycle routes locally with plans in place for improvements'*. There are plans – notably the Gt Waltham Route - but the Council is unaware of any designated routes at the moment.

#### Health

There is no doctor's surgery in Broomfield.



## Education

Both Chelmer Valley High School and Broomfield Primary School have specific entrance points, which are further away than the 'as the crow flies' distances suggested in this paragraph.

## Bus Services (page 11)

The assertion that '*The proposals **will** provide a bus service into the development ...*' (page 11) is at variance with the more carefully phrased suggestions elsewhere in the MFD, for instance Site Considerations, Access & Movement, (page 22) '*...later phases **could** provide an internal bus service.*'

## Parish Council Workshops (page 26/7)

The need for a robust, wooded green buffer on the northern and western boundaries of SGS6 was raised and noted at these workshops.

## Green & Blue Infrastructure (page 32)

The tree and hedgerow line associated with the existing public right of way is not well placed to link Puddings and Sparrowhawk Woods as it doesn't connect to Puddings Wood, especially with the construction of the Hospital link road. Only a robust woodland belt on the western edge of SGS6 can do this effectively.

## **11. Conclusion**

Broomfield Parish Council welcomes the opportunity to submit the above comments on the proposed masterplan for SGS6 and hopes that the concerns raised will be fully addressed. The Council looks forward to a continued dialogue with the City Council, Bloor Homes and other stakeholders to ensure that the development of SGS6 leads to the best possible outcomes for all its residents, both existing and new.