

Planning Application 20/02064/OUT

Strategic Growth Site North of Woodhouse Lane,
Broomfield

Outline application for residential development for up to 550 dwellings (use class c3), local centre (use classes e, f.1 And f.2), Formal and informal open space, and associated infrastructure. All matters reserved except for primary access.

Representations of Broomfield Parish Council

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Prepared for Broomfield Parish Council by
Places4People Planning Consultancy

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Introduction

The comments in this representation are submitted in response to the outline planning application for residential development for up to 550 dwellings (use class c3), local centre (use classes e, f.1 and f.2), Formal and informal open space, and associated infrastructure at the Strategic Growth Site North of Woodhouse Lane, Broomfield.

The comments are based on the content of application documents submitted up to 25 January 2021, but the Council reserves the right to submit further comments on any future documents submitted by the applicant in support of the application.

Background

The Parish Council has taken an active role in responding to the allocation of the site in the Local Plan and the subsequent preparation of the masterplan. The applicant has also directly consulted the Parish Council through the neighbourhood planning process during the preparation of the current planning application.

The Parish Council accepts that the principle of the development of this site has been accepted through its allocation in the adopted Local Plan. However, we are now keen to ensure that the development of this site minimises any detrimental impact on the village and its residents.

Summary Conclusions

In short, the Parish Council has a number of reservations and concerns about the content of the planning application, which can be summarised as follows:

- 1 The number of dwellings proposed is unacceptable and is not in accordance with the Local Plan;
- 2 The mitigation measures to overcome the traffic impact of the development are insufficient; and
- 3 The application provides no guarantee of the delivery of the access to Broomfield Hospital and Farleigh Hospice as required by the Local Plan policy

General Comments

Given the outline nature of the application it is difficult to understand the status of the Planning Statement, Design and Access Statement and other supporting material included with the application, should the City Council be minded to approve the application and sets conditions based on their content.

Notwithstanding this, the content of these documents has been taken into account in preparing the Parish Council's response.

Policy Background

The site is allocated as Strategic Growth Site Policy 8 of the adopted Chelmsford Local Plan (2020). The policy provides a number of criteria against which development proposals will be considered, including:

- A high-quality landscape-led development that maximises opportunities for sustainable travel.
- To accord with a masterplan approved by the Council to provide:
 - around 450 new homes of mixed size and type to include affordable housing
 - on-site supporting development including a Neighbourhood Centre and a new stand-alone early years and childcare nursery located in the southern portion of the site.

The Masterplan Framework was adopted by the City Council Cabinet in July 2020 subject to the following conditions:

1. Notwithstanding the approved Masterplan Framework dated April 2020 the orange coloured footways as depicted on the plan shall hereafter be referred to as foot and cycleways and all development parcels must benefit from adequate connections to both foot and cycle network. Post approval of the masterplan it is expected the plan will be updated to reflect this.

2. A Sustainability Framework document shall be produced and appended to the Masterplan Framework dated April 2020 (or as amended in accordance with this decision), which shall confirm the overall objectives for delivering sustainable construction at this site and which shall demonstrate that the development is looking forward in terms of national and local targets for energy use and carbon emissions as well as looking at opportunities, where appropriate, for amalgamated and community systems of heat and power generation and reducing water consumption in line with (or better than) the optional building regulations standards.

3. Notwithstanding the approved Masterplan Framework dated April 2020 the Essex Quality Review Panel concluded the landscape belt along the western boundary should be increased to 50 metres in width when measured from the western boundary along the entirety of that western edge. In order to achieve this a study shall be compiled, to be agreed with officers, to confirm how this will be designed since this will require some consequential adjustments to the development parcels in that area of the site. Once a suitable masterplan layout has been agreed (within the overall time permitted for compliance with this condition) it is expected the plan will be updated to reflect this.

4. A Structural Landscape Framework document shall be produced and appended to the Masterplan Framework dated April 2020 (or as amended in accordance with this decision), which shall confirm the overall objectives for structural landscape areas within the site, their sequencing of delivery relative to wider works to ensure they provide the necessary benefits to be relied upon for mitigating or compensating the impacts of development (including provision of the hospital access through Puddings Wood) in real time and to underline that this is landscape-led approach to development.

The Planning Statement attached to the application notes, in paragraph 5.56, that the "Masterplan Framework has been finalised and was submitted to the Council in October 2020 for approval." The Masterplan Framework had not been published by the City Council when the planning application was made but has been provided to the Parish Council when requested.

The Masterplan Framework (October 2020) identifies the key principles underpinning the design proposals for the site and includes an “Indicative Masterplan” illustrating the extent of land take for the planned uses.

The Planning Application

The application is accompanied by a Planning Statement and Design and Access Statement. The latter, in so far as can be assessed, is largely consistent with the Masterplan Framework but there are some discrepancies that the Parish Council draws attention to in the form of the table below.

Masterplan Framework	Compliance of application
New homes	
Deliver approximately 450 new homes.	The application does not comply in that it proposes up to 550 homes, an increase of some 22% over the planning policy requirement.
Provide a coherent network of public open space, formal and community space within the Site.	The Indicative Masterplan (p37 of the Masterplan Framework – Oct 2020) identifies the extent of the development areas. The illustrative layout drawing accompanying the application (RG-M-16 P (Figure 3.3)) proposes residential development beyond the extent of the development areas illustrated on the indicative masterplan. Based on the illustrative layout, this would amount to approximately 40 additional dwellings.
Access & sustainable connections	
A new vehicular, pedestrian and cycle access will be provided to connect with Broomfield Hospital internal perimeter road.	There is no provision in the planning application for this to be delivered.
Safe and convenient walking and cycling routes to community facilities in Broomfield and Little Waltham where feasible.	There is no indication as to how these will be delivered by the application in the immediate area (and equally importantly to the City centre). Except for possibilities suggested in the Environmental Statement, Vol. 3
Green Space, enhancing habitats and biodiversity	
Create a network of Green infrastructure and provision of public open space.	The extension of the development area referred to above has eroded the extent of the proposed landscaping as envisaged on the Indicative Landscape Framework in the Masterplan Framework.

Enhance existing habitats and biodiversity through a comprehensive network of planting connected to the wider ecological features.	As a result of the erosion of the landscaping area noted above, the opportunities to enhance the habitats and biodiversity is severely diminished.
Retain the main hedgerow & PRow running north south through the Site as a key structuring feature, limiting breaks where possible.	The extent of development proposed in the illustrative layout diminishes opportunities to protect and enhance this hedgerow.
Community facilities	
A new community led neighbourhood centre will be located centrally within the site with access from the main spine road and within easy walking distance for all residents. The facilities will be focused on a multi-functional community building and may include a children's nursery and / or a primary health care practice, subject to agreements with Essex County Council or the NHS.	The application makes provision for a "community led neighbourhood centre", although it is not clear how this will be delivered.
Respecting wider communities	
Provide links to existing pedestrian and cycle networks.	There is no demonstration as to how improved networks will be delivered.
Provide a new village greens to complement local character.	Only one village green is included in the "Concept Masterplan on page 55 of the Design and Access Statement.

Planning Application Planning Statement

Section 4 of the Planning Statement describes the proposed development. This has informed the Parish Council's specific comments on the planning application, as set out below:

1 – Residential Development

The Statement notes that the proposal is for up to 550 dwellings and that this would mean an average density across the site of 35 dwellings per hectare. Not only is this number some 22% higher than the figure in the Local Plan Policy and approved Masterplan Framework, it represents an unreasonably high net density of development when compared with densities across Broomfield village as a whole. It will result in an urbanisation of the village more appropriate to that found in the City itself.

Paragraph 8.9 of the Planning Statement refers to the Inspectors Report into the Local Plan which states that the actual capacity will be determined through the site

masterplanning and planning application process. The applicant suggests that “it is reasonable to assume the ‘degree of flexibility’...can extend to up to 550 dwellings.” The Parish Council disagrees with this interpretation and considers that the application has failed to sufficiently demonstrate why the figure of 550 homes is justified. The Local Plan states that the site “is allocated for a high-quality landscaped development” and not a housing led development that seeks to maximise the amount of housing on the site.

The Masterplan Framework, as considered at Cabinet in July 2020, referred (on page 28) to the delivery of “approximately 450 new homes”, a fact repeated on page 30 of the April 2020 Masterplan Framework. The proposals for up to 550 homes are therefore contrary to the Masterplan and should not be supported.

Without a “density parameters” plan forming part of the application, approval in its current form will allow individual phases of development to come forward in a piecemeal way without regard to overall densities on site and could in fact result in even more than 550 homes ultimately being delivered on site and still conform with the development areas identified in the Masterplan Framework – Oct 2020.

Providing density parameters would also provide an opportunity to indicate a broad strategy to ensure that the type of dwellings proposed meet local need. The Housing Needs Assessment provided by AECOM for the Broomfield Neighbourhood Plan indicates a housing mix that will best meet local need. Whilst we appreciate that the detail of such a strategy will be ‘fleshed out’ in detailed planning applications, it is important for an outline strategy to be sketched out at this stage.

In particular, it is disappointing that no indications have been made to date as to where three storey housing would be considered appropriate having regard to the landscape within which the site sits and the potential visual impact that such development might have. There is a case for high-quality apartments for retired people who wish to downsize but stay in the Broomfield area. This would be appropriate in the eastern part of the site, which is lower and closer to existing bus routes on the B1008. However, they would be completely inappropriate on the higher land to the west of the site. This is explained in greater detail in the Council's response to draft masterplan (attached to this document).

The application should have made the likely location of three storey buildings more explicit, in order to enable of proper understanding of its merits.

2 – Open Space and Green and Blue Infrastructure

It is disappointing that more is not made of the green corridors through the site and, in particular, the opportunity to provide a wildlife corridor between Puddings Wood and the ancient woodland of Sparrowhawk Wood to the north of the site. A reinforcement of planting along the northern side of Woodhouse Lane and along the western boundary of the site, adjoining the playing fields, would help to connect these habitats as well as provide screening between the site and the hospital and wider countryside. The Parish Councils' comments on the draft masterplan (repeated below) identified how exposed this edge is and how it could be

remedied, for instance by purchasing a strip of land from the adjoining Bedford Playing Fields to create a thicker, more robust belt of woodland.

“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:”



Inadequate tree cover at Long Shapley Belt

Within the site there is a limited amount of existing vegetation and, again, it is disappointing that there appears to be little in the way of a celebration of these features and the need to reinforce and protect them. Indeed, as noted above, the Illustrative Layout drawing actually erodes the spaces that had been set aside in the Indicative Landscape Framework in the Masterplan Framework.

The setting back of development away from the site entrance at Blasford Hill is welcomed but it is hoped that the dwellings that will front onto the junction will be of the highest architectural quality in order to maintain the importance of this gateway into Broomfield village.

Proposed play area:

Finally, the Council is concerned about the location of the children's play area close to the central water feature. We suggest that it is moved into a safer part of the green area in the south-eastern section of the site.

3 – Vehicle, Cycle and Pedestrian Access

The Parish Council has commissioned a separate highways assessment which is attached to this representation. Our main concerns are:

3.1 Hospital Access Road:

The Parish Council is concerned that the new vehicular access road into Broomfield Hospital campus required by paragraph 7.292 of the adopted Local Plan is not provided by the development but that it is to be “subject to a separate application and approval process in due course” (para 4.19 of the Planning Statement). Given that it is a separate application, it will not be possible to condition its delivery through

the current planning application or any Section 106 Obligation that is agreed as part of it.

A 'separate application' approach also seems more dependent on the active engagement of the Hospital Trust, which has many more pressing matters to consider. The impact of these higher priorities on planning matters is illustrated by the failure to implement changes to the B1008/Hospital Approach junction that were agreed as part of the expansion of Broomfield Hospital in the early 2000s. This failure inevitably creates a strong lack of confidence in the 'separate application' approach to achieving the new access road

In meetings with the Parish Council/Neighbourhood Plan Group, the applicant has stated that they will not push for the determination of this application until the separate application for the hospital access is submitted. This is a matter that cannot be considered in planning law. The City Council must consider the application before them and not what might be submitted in a separate application. As submitted, the outline planning application is not in conformity with the adopted Local Plan or the approved Masterplan Framework as it does not deliver the access road to Broomfield Hospital.

Finally, as the Council has commented many times, it is vital that the Hospital access road is multi-purpose. Any limitations on its use will significantly reduce the positive impact of the new road on the wider highway network and will create access problems within the development. These are explained further in the Transport Update and the Council's response to the masterplan (both attached)

3.2 – School Lane / Main Road Junction Measures:

Volume 3 of the Environmental Statement (the Transport Assessment) refers to the School Lane / Main Road junction and the fact that it will be operating at over-capacity. Figure 7.9 illustrates a proposal for junction improvement and the following paragraphs appear to assume it will be implemented. However, this is not the case, as implementation was linked to a proposed development south and west of Broomfield Place which has lapsed and is not included in the current Local Plan.

The applicant should therefore consider implementing this junction improvement, in order to mitigate the impact of the development on this over-capacity junction. However, without the new route options that would have been offered by the linked development south and west of Broomfield Place, an improved junction will need to be signal controlled. Otherwise, given the indicated level of traffic on Main Road, it is difficult to see how vehicles will have the opportunity to turn right out of School Lane onto Main Road. This is especially the case at peak times and will result in considerable queues. Therefore, Parish Council believes that an improved junction must also be signal controlled to reduce hold-ups on School Lane.

3.3 – Proposed Mitigation Measures:

Section 8 of the Statement identifies proposed mitigation measures, including a bus strategy, car club and pedestrian/cycle improvements. The Parish Council considers that these measures will not mitigate the traffic impact as suggested for the following reasons:

i – It is noted that the Design and Access Statement indicates the Hospital Access Road as being a bus route with bus stops. This would be welcome. However, the relevant Statement of Common Ground presented to the Local Plan Examination in Public suggested that developments of this size would not necessarily attract bus route diversions (Chelmsford Local Plan Statement of Common Ground - Provision of Bus Services for the Allocated Sites within the Local Plan, Para. 1.14). This position must be clarified beyond doubt as the nearest routes will otherwise be located on the B1008 – a long walk from some sections of the development.

In terms of the broader strategy to encourage bus travel, it is welcome that residents will be encouraged by a free bus pass for a year. It is questionable whether high uptake will continue after the free year is over, as the ordinary cost of bus travel is high (approx. £5 adult return to the City Centre) and residents will need to own cars anyway for travel outside of frequent bus service times.

Furthermore, buses on the B1008 are subject to the same congestion as cars, as there are no reserved bus lanes. This will impact on the frequency and reliability of services. A residents' survey conducted as part of the Broomfield Neighbourhood Plan asked what would encourage people to use the bus. Most respondents said reducing the cost, improving frequency and reliability. Reliability and frequency are unlikely to be addressed unless physical bus priority measures are introduced along the route. The application therefore needs to include funding for such measures.

ii – Without significant off-site investment in safe cycle routes, there is unlikely to be a significant shift towards cycling for journeys to/from the City Centre or the station. The creation and enhancement of the footpath and cycleway network on or adjacent to the site is welcome. However, given the reliance on improvements to the wider network further away from the site, there needs to be some agreement to make contributions to delivering these wider improvements.

iii - Paragraphs 8.25 to 8.30 of the Transport Assessment proposes the introduction of a "Smarter Choices Campaign" in the existing village of Broomfield. The above comments equally apply to this proposal, with the added factor that a year's free bus travel is not included. Therefore, the Parish Council considers the claim that the Smarter Choices Campaign would result in a 7%- 8% reduction in traffic to be unfounded.

3.4 – Managing car parking on the site:

The Parish Council wishes to raise an early concern about the potential for Hospital employees and visitors parking in the new residential streets rather than parking on the Hospital site. It is a common problem in the vicinity of hospitals in the region (including Broomfield) and the developer should pay for the implementation of measures to limit this happening while still allowing residents' parking.

3.5 – Woodhouse Lane

It is unclear from the application what the future role and treatment of Woodhouse Lane will be once the new access road through the site is completed. Measures will be required to manage access along this route and to ensure that it doesn't become overflow (free) parking for the hospital and does become an important and attractive cycle and footpath route from the site.

4 - Community Hub

It is noted that land is reserved for a "community led neighbourhood centre". However, there needs to be a mechanism in place to deliver such facilities including engagement with the Clinical Commissioning Group and medical practices. In addition, we suggest that the developers put funding in place to 'kick-start' and then maintain the effective use of the new facilities. This could be done by creating a new community organisation or by coming to an arrangement with one of the nearby parish councils.

5. Primary School Places

We understand that the nearest primary schools in Little Waltham and Broomfield were considered to have sufficient capacity for around 450 new dwellings in this development. The Council is therefore concerned about the impact of a further 100 dwellings which may well (dependent on size/type) attract young families. Both primary schools have recently been expanded to one form of entry (Little Waltham) and two forms of entry (Broomfield), meaning that further expansion to accommodate a part form of entry is impractical.

Providing contributions in lieu of expansion at these schools will clearly not solve the problem of where these additional children can be offered primary school places. At the very least, it is likely to cause significant disruption to existing catchment areas and consequently to family expectations. Careful consideration must be given to the advice of the Education Authority in this regard

Conclusions

In summary, Broomfield Parish Council thanks the City Council and Bloor Homes for engaging us through the early stages of the development of this site. However, the Parish Council strongly objects to the proposal for up to 550 homes on the site which is contrary to the adopted Masterplan Framework for the site and therefore Strategic Growth Site Policy 8 of the adopted Chelmsford Local Plan (2020). Major concerns are also made concerning the proposed development mitigation measures being put in place as proposed in the supporting documentation of the application.

Given these concerns, the Parish Council cannot support the approval of the application in its current form.

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

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.broomfielddessex.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.broomfieldessex.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 4th 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.broomfielddessex.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.

Broomfield Parish Council
Proposed Woodland Belt to south, west and north.
Linking Puddings Wood and Sparrowhawk Wood

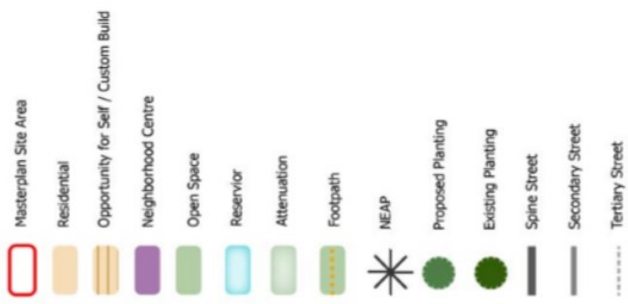


Indicative Masterplan

MAP B

Broomfield Parish Council

Suggested closure points on Woodhouse Lane



Hospital Link Road

Western section closed to vehicles

Access to/from Hospital Approach

Eastern section closed to vehicles

Indicative Masterplan

M21003 LAND NORTH OF WOODHOUSE LANE, BROOMFIELD

TRANSPORT REVIEW NOTE

JANUARY 2021

Introduction

1. TTHC Ltd have prepared this Technical Note on behalf of Broomfield Parish Council, in relation to the “Land North of Woodhouse Lane” planning application (Chelmsford City Council ref 20/02064/OUT). The site is at the north end of Broomfield, and immediately north of Broomfield Hospital.
2. Broomfield Hospital includes an A&E department and serves an extensive area to the north of Chelmsford, including Braintree and the surrounding villages.
3. TTHC previously carried out an independent review of this allocation during the Chelmsford Local Plan consultation. In the 2020 adopted Local Plan, the site is now allocated as *Strategic Growth Site Policy 8*, to provide 450 dwellings.
4. The application includes a Transport Assessment (TA) by Mayer Brown, which in turn forms Volume 3 of the Environmental Statement (ES) by Barton Willmore.

Changes from the Allocation

5. The allocation is for 450 dwellings, but the live application is for 550 dwellings. This will result in additional vehicle movements compared to the Local Plan assessed position.
6. The adopted Local Plan lists the following principles under “Movement and Access”:
 - *Main vehicular access to the site will be from Blasford Hill (B1008)*
 - *Provide a new vehicular access road to serve the development and provide access to Broomfield Hospital and Farleigh Hospice*
 - *Provide pedestrian and cycle connections*
 - *Provide a well-connected internal road layout which allows for bus priority*
7. And in relation to Broomfield Hospital:

7.292 The development will provide a new vehicular access road into Broomfield Hospital campus. This will help serve Broomfield Hospital, Farleigh Hospice and King

Edward VI Grammar School playing fields. In addition, the new link road will facilitate a reduction of traffic on the rural lane network with a view to downgrading Woodhouse Lane and North Court Road to routes for local access only. It will also help to ease wider congestion on the Main Road, Broomfield corridor. The delivery of the new access road into Broomfield Hospital is a strategic objective of the Local Plan. Site developers should work in partnership with the Mid-Essex Hospital Trust to facilitate this proposed new vehicular access road to the Hospital.

8. Modelling for the Local Plan assumed that the access road into Broomfield Hospital from the north would be 'multipurpose' and thus open to all motor traffic, including hospital patients. However, the TA (para 1.6) states that the link road would be restricted to hospital staff, deliveries, buses and ambulances.
9. The adopted Local Plan also lists under "Site infrastructure requirements":
 - *Appropriate improvements to the local and strategic road network as required by the Local Highways Authority*
 - *Appropriate measures to promote and enhance sustainable modes of transport*
 - *New and enhanced cycle routes, footpaths, Public Rights of Way and bridleways where appropriate [...]*
 - *Financial contributions to delivery of the Chelmsford North East Bypass*

Review of Transport Assessment

10. For consistency with previous work, TTHC have used vehicle trip rates from the industry standard TRICS database, rather the Local Plan generic rates which were used for urban and rural sites across the City of Chelmsford.
11. The TA Appendices are provided as low-resolution scans and so it was not possible to validate the trip distribution data.
12. TTHC's previous assessment showed that the proposed development would increase traffic on the B1008 through Broomfield village by **8-10%**, relative to 2036 Base traffic flows.

13. The application includes 22% more dwellings than the allocation and so the traffic increase on the B1008 would now be **10-12%**. These trips are shown on the local road network in **Appendix A**.

Hospital Approach and Link Road

14. As set out in the Local Plan, the link road would allow some Hospital traffic to/from the north to divert through the application site, and avoid the B1008/Hospital Approach roundabout. With the proposed restrictions to usage of the link road, it is unlikely that more than one third of the Hospital traffic would divert in this manner. This diversion is also shown in the attached diagrams.
15. If the proposed restriction is a physical gate, at peak times there would be a queue of idling vehicles through the application site to enter the Hospital and vice versa, with adverse noise and air quality impacts locally.
16. A more sophisticated system would use 'free flow' camera technology, as used at other hospitals. This would allow patients from the north of Chelmsford to use the new access route, reducing congestion at the B1008/Hospital Approach roundabout. Patients could provide vehicle registration details within the Hospital buildings, and enforcement action could be taken against non-permitted use.
17. Although the Local Plan identified a committed improvement scheme for the B1008 / Hospital Approach roundabout, this has not been delivered so far. If the link road allowed a wider range of users, the need for this improvement scheme could be re-examined.

Broomfield Village

18. Regardless of the final form of the link road, there would still be a net increase on the B1008 corridor through Broomfield, between Hospital Approach and the city centre.
19. As shown in **Appendix A**, the majority of development traffic will route to and from the south on the B1008 corridor through Broomfield. The B1008 (Main Road) through Broomfield is a key bus corridor, with around 10 buses per hour in each direction. It is

also the emergency vehicle route between central Chelmsford and Broomfield Hospital.

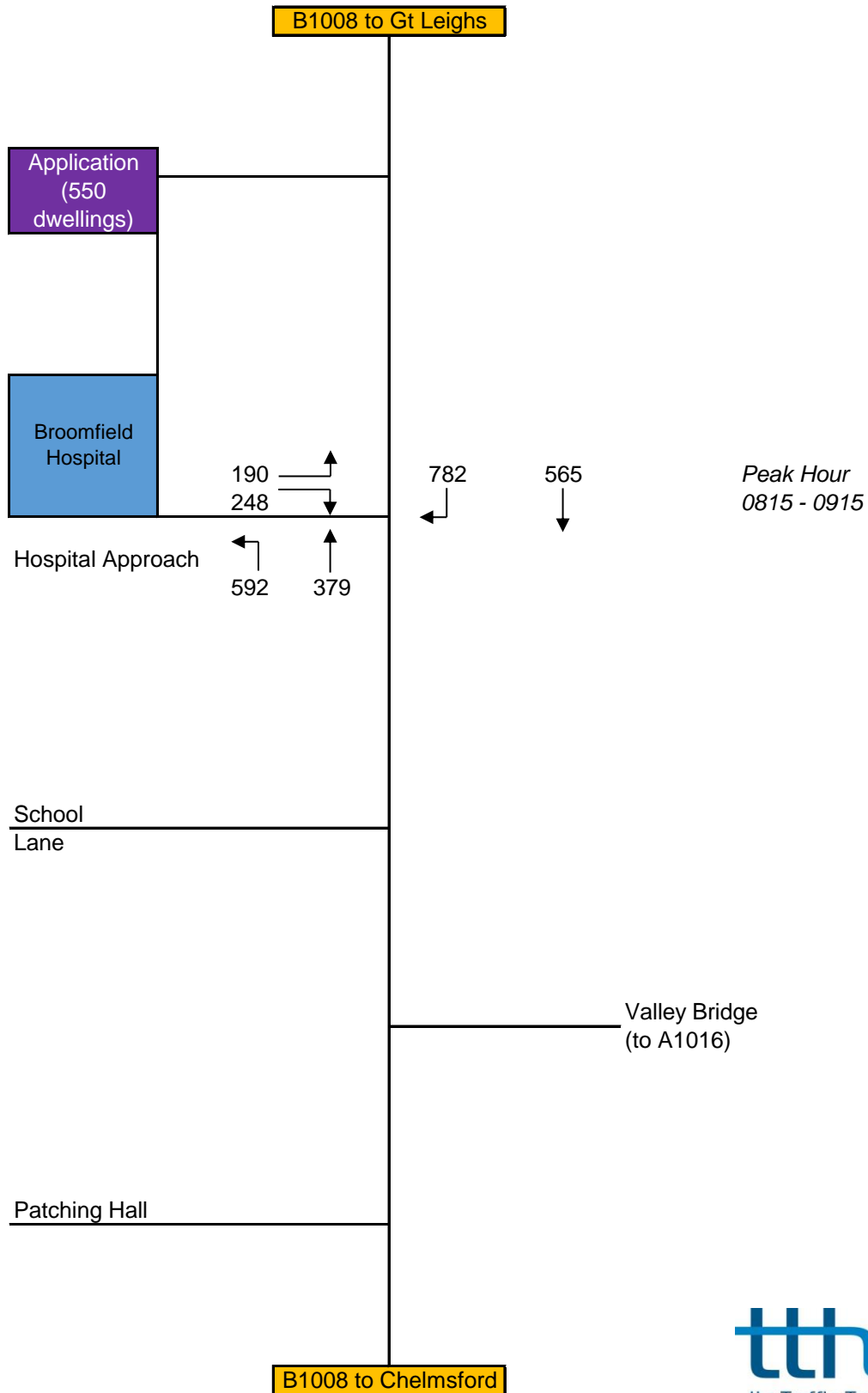
20. At the B1008 Main Road/School Lane junction, the impact of the development has not been tested adequately in the TA (para 7.5). The TA refers to the capacity assessment from the Local Plan, which only tested the impact of 450 dwellings, and found that the junction would be above capacity in 2036.
21. By failing to include this assessment, the application fails to “**address the potential impacts of development on transport networks**” as required in the National Planning Policy Framework (NPPF para 102).
22. The TA (para 7.28) does not propose capacity improvement, but instead proposes ‘Smarter Choices’ measures to encourage modal shift. While this is welcome and aligns with the Local Plan allocation, the TA assumptions may be too ambitious.
23. **Appendix B** presents Census data for *Chelmsford 001 MSOA* which covers the application site. This shows that 72% of people currently travel to work by car, and 15% travel by public transport. These levels reflect the site’s location on the edge of the Chelmsford urban area.
24. The TA claims that vehicle trips could be reduced by 7-8% by encouraging modal shift, but does not provide any evidence for this claim beyond a vague reference to ‘DfT pilot studies’.
25. The B1008 corridor will therefore remain over capacity with the development in place. This is of particular concern as the B1008 forms the emergency route between central Chelmsford and Broomfield Hospital.
26. Returning to the potential for modal shift, there are no physical measures proposed along the B1008 corridor by the applicant (or any other body) which would improve general traffic capacity, or bus journey time reliability.
27. There is scope to introduce traffic light signals at the B1008 Main Road / School Lane junction, including a short flare on for vehicles turning right into School Lane. The pedestrian crossing further south could be relocated into this junction.

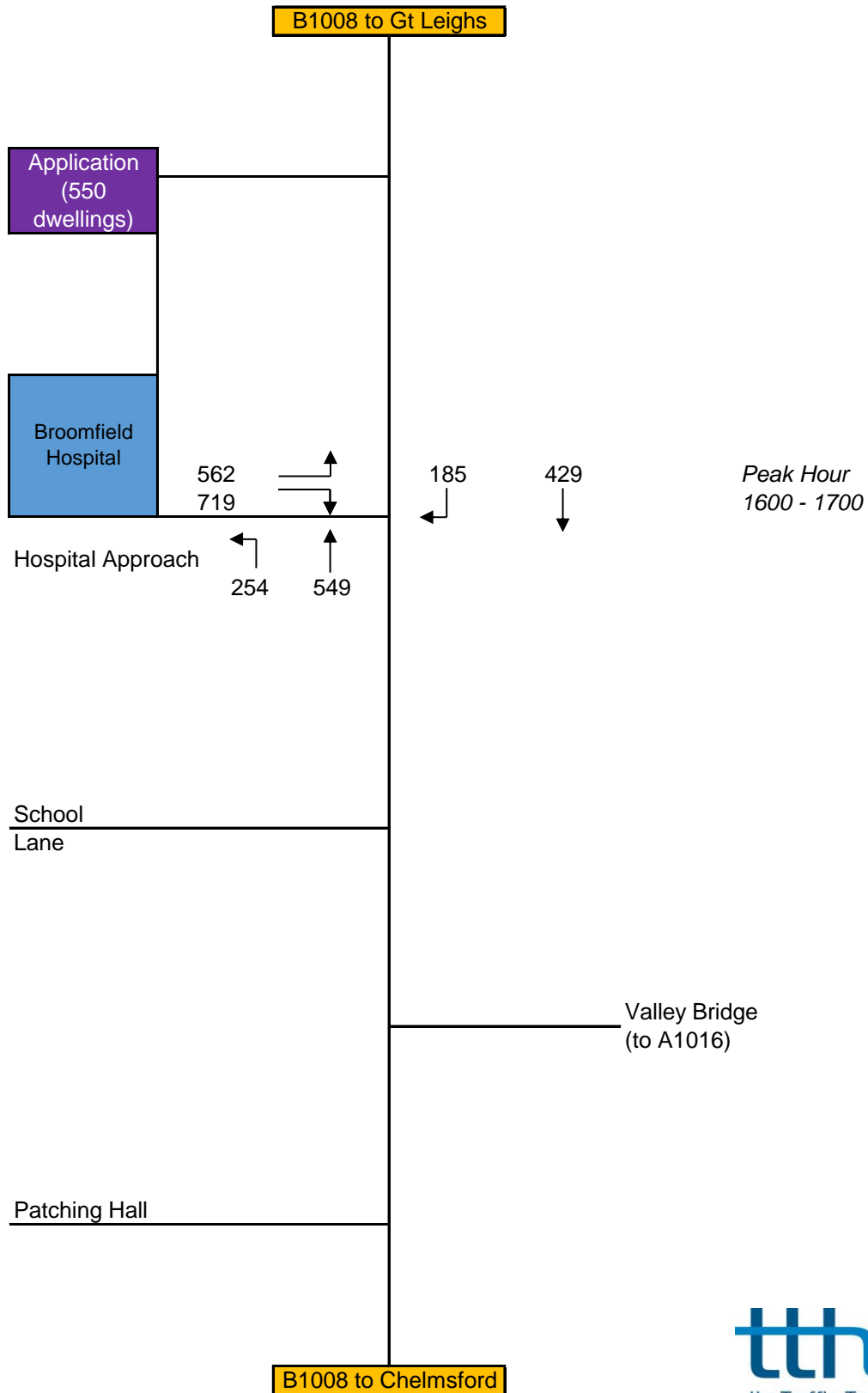
28. Although a signals arrangement would require a small amount of land from the village green to the west, this could be mitigated by stopping up the 'slip road' alongside Madelayne Court, and incorporating that land into a larger village green. As this is a registered village green, this would require the consent of the Parish Council and may need to follow a legal process.
29. The applicant should explore this option further. It would both reduce the forecast congestion at this junction, and improve bus journey times between the site and central Chelmsford.
30. The applicant could also contribute towards the scheme of cycle routes proposed by Broomfield Parish Council via the Neighbourhood Plan process. These routes would enable easier cycling between Broomfield and central Chelmsford. Although routes exist between central Chelmsford and the Valley Bridge area, there is no cycle path, nor a funded proposal for one between Valley Bridge and Broomfield.
31. It should also be noted that the Local Plan relies heavily on completion of the Chelmsford North Eastern Bypass. However, there is still uncertainty over the delivery of this scheme. In any case, the Bypass would not affect the local distribution of the development traffic on the B1008 corridor through Broomfield.

Recommendations

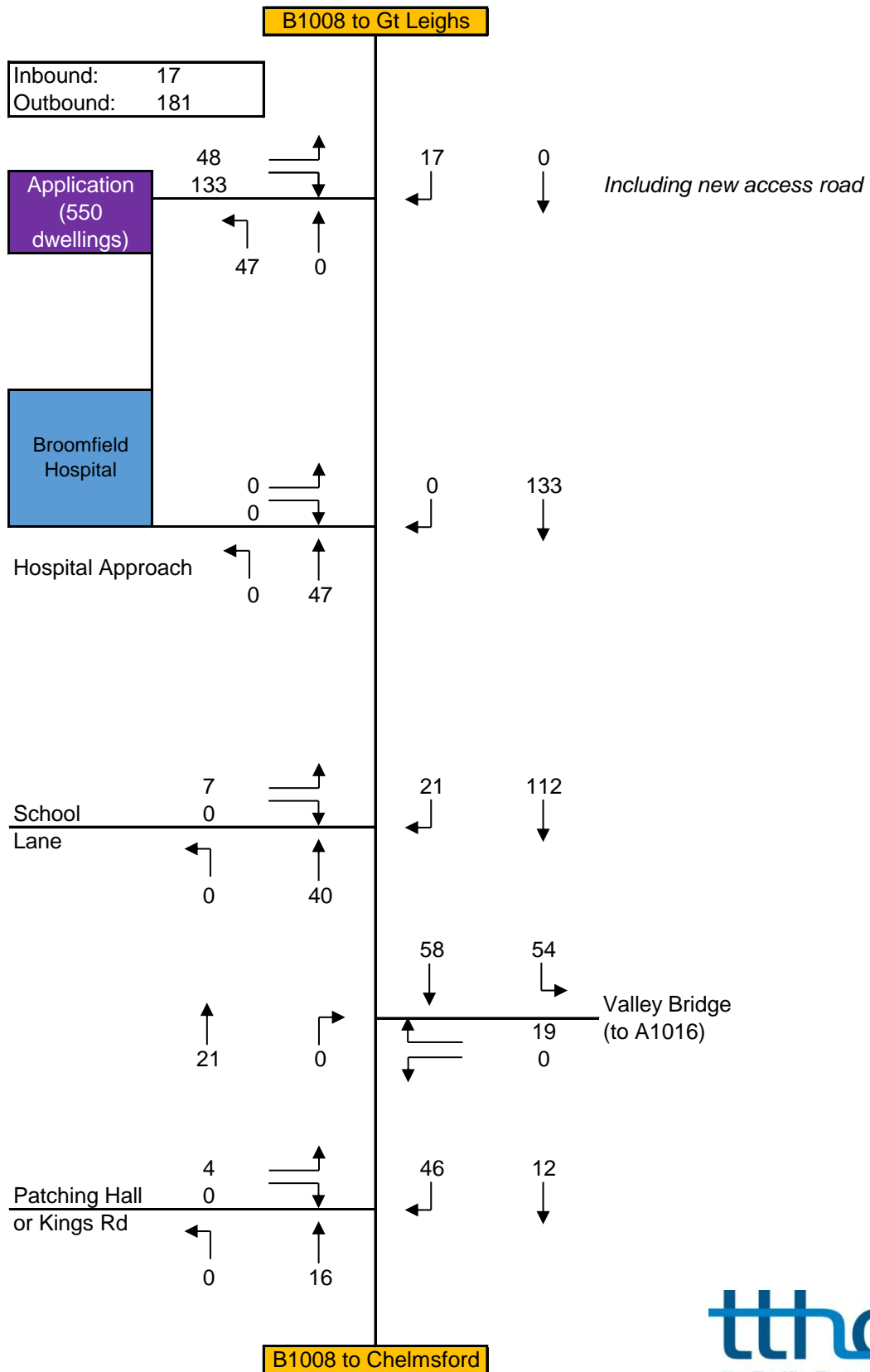
32. The proposed link road to Broomfield Hospital would be most beneficial as a multipurpose route. However, if this is not possible, the access to the Hospital site should at least allow patients from north of Chelmsford to access the Hospital, with suitable access control.
33. The application should include an updated capacity assessment for the B1008 Main Road / School Lane priority junction. It should also investigate fully whether capacity mitigation can be provided at this junction, which would benefit bus and cycle movements as well as general traffic.
34. Additionally, the applicant could contribute towards the cycle routes proposed in the Broomfield Neighbourhood Plan.

35. These changes would provide more effective mitigation for the impacts of the development, as identified by the criteria for the Chelmsford Local Plan allocation, and as the National Planning Policy Framework requires.

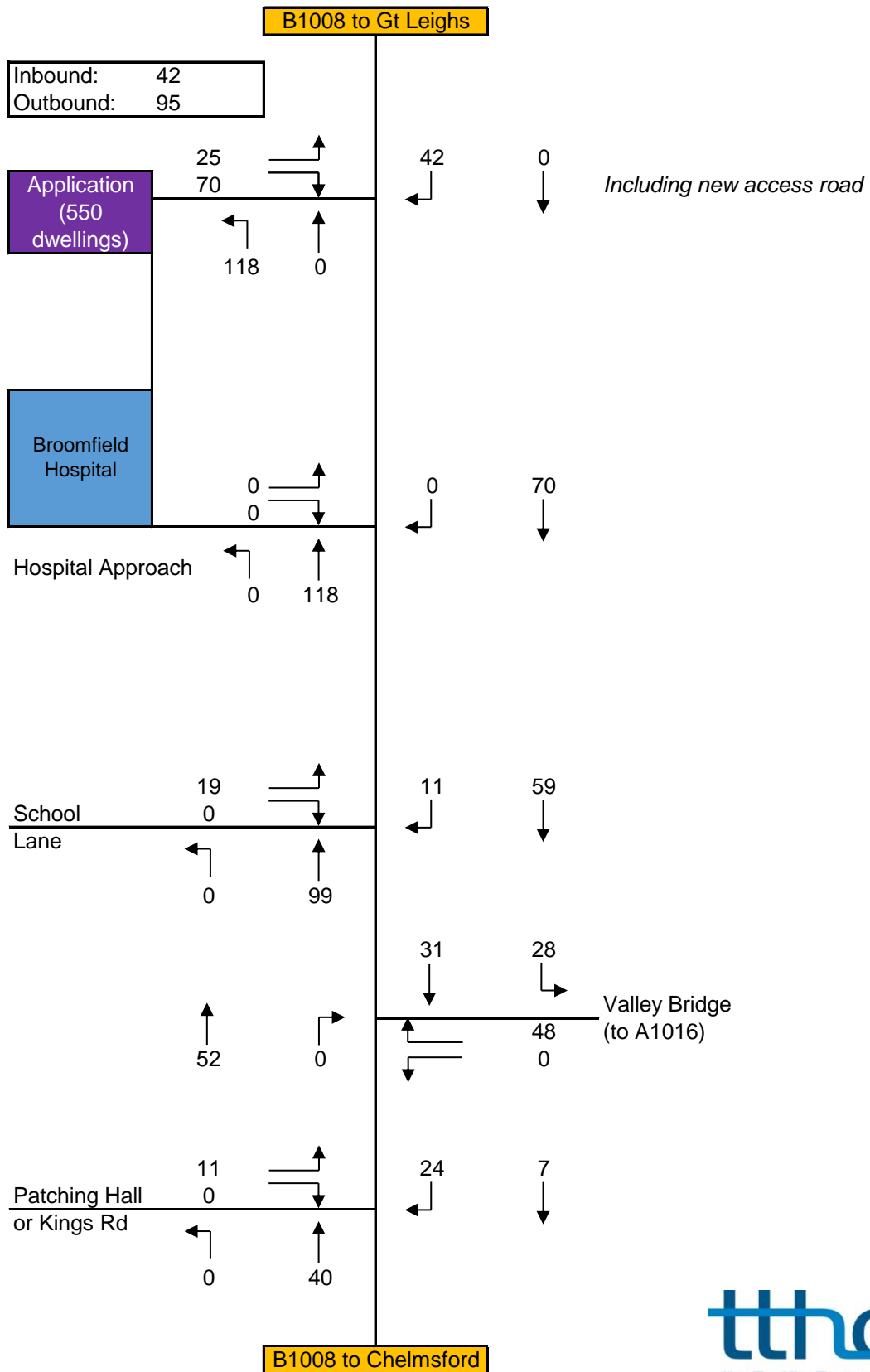




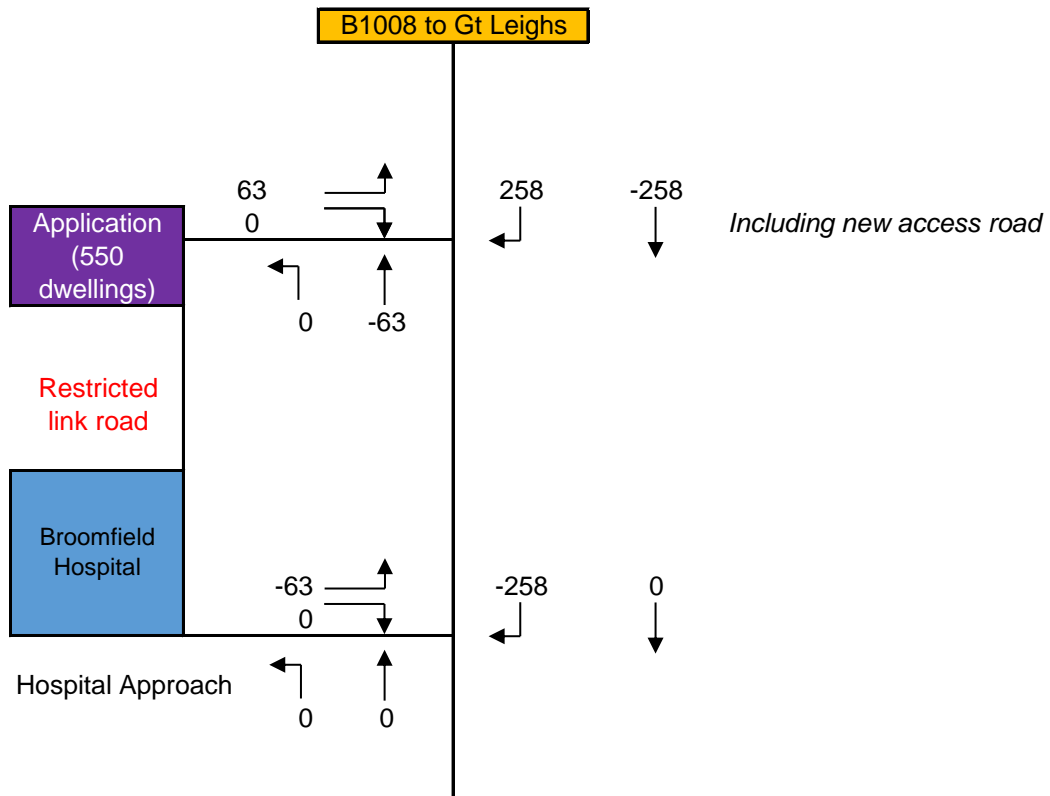
DEVELOPMENT TRIPS - AM PEAK HOUR



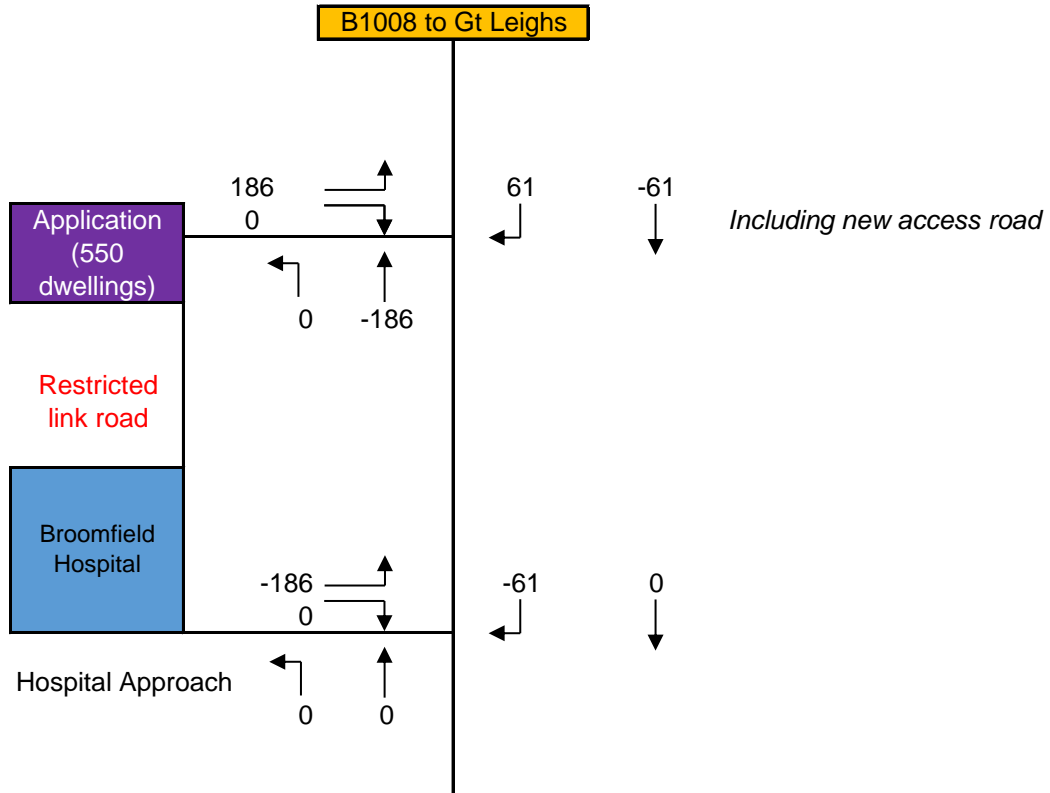
DEVELOPMENT TRIPS - PM PEAK HOUR



HOSPITAL DIVERTED TRIPS (33% DIVERT) - AM PEAK HOUR



HOSPITAL DIVERTED TRIPS (33% DIVERT) - PM PEAK HOUR



Census data

QS701EW - Method of travel to work
ONS Crown Copyright Reserved [from Nomis on 21 January 2021]

population

units

area type

area name

rural urban

All usual residents aged 16 to 74

Persons

2011 super output areas - middle layer

E02004485 : Chelmsford 001

Total

Method of Travel to Work	2011	Percent
All categories: Method of travel to work	5,081	
Work mainly at or from home	322	
Underground, metro, light rail, tram	11	
Train	341	
Bus, minibus or coach	116	
Taxi	11	0%
Motorcycle, scooter or moped	32	1%
Driving a car or van	2,290	72%
Passenger in a car or van	149	5%
Bicycle	44	1%
On foot	183	6%
Other method of travel to work	15	0%
Not in employment	1,567	
Public transport total	468	15%
Total excl home work / not in employment	3,192	
		100%

In order to protect against disclosure of personal information, records have been swapped between different geographic areas. Some counts will be affected, particularly small counts at the lowest geographies.

