

Chelmsford Local Plan Issues and Options Consultation

Response by Broomfield Parish Council ('the Parish Council')

October 2022

Challenges and Opportunities

Q1. Do you agree with the challenges and opportunities identified for the review of the adopted Local Plan? If not, please explain why. Where possible, please support your answer with reference to any evidence.

Agree.

Vision

Q2. Do you agree with the proposed new Vision? If not, please give the reasons for your answer.

Strongly agree. It is clear, concise and focusses on the future rather than the past, so is a considerable improvement on the current Vision.

Strategic Priorities

Q3. Do you agree with the proposed updates to the Strategic Priorities? If not, please give the reasons for your answer. Please refer to the Strategic Priority number in Table 4.

Broadly agree. It is helpful for linked priorities to be grouped together. However, we suggest:

- The first group (priorities 1, 2 and 3) should be called 'Priorities for Climate and the Environment', as the Natural and Historic Environment is broader than climate and ecology (for instance, it includes landscape)
- Priority 4, bullet point 3, the Parish Council doesn't agree that using the Settlement Hierarchy will necessarily lead to the most sustainable development locations (see answer to Q. 61 below)
- Priority 4, the Parish Council doesn't believe that protecting the Green Belt is particularly connected with sustainable development patterns. The Green Belt tends to extend commuting journeys and rules out some quite sustainable development locations. The reason for protecting the Green Belt is largely because it is Government policy. It would therefore be better placed elsewhere, perhaps in the 'Priorities for Place' group as a separate priority.

Q4. Are there any Strategic Priorities you think should be added? Where possible, please support your answer with reference to any evidence.

No.

Addressing the Climate and Ecological Emergency

Q5. Do you support the approach being taken? If you disagree, please explain why?

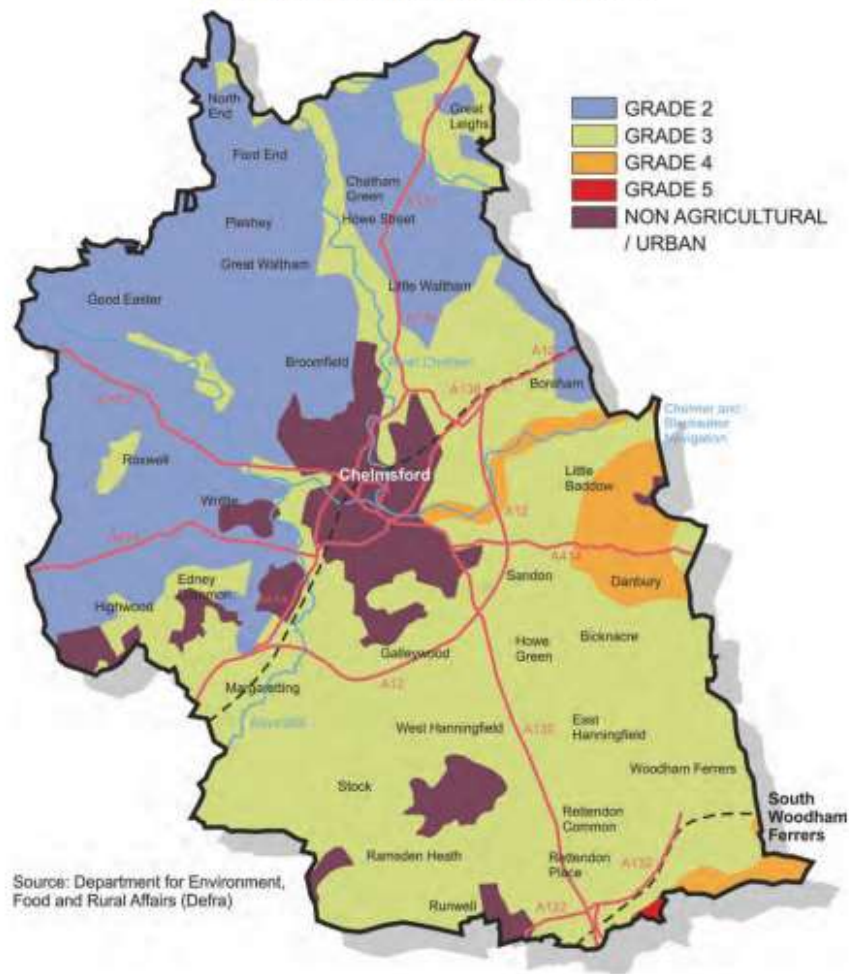
Yes. The Parish Council particularly supports the approach of being 'more proactive in addressing the climate and ecological emergency' (para 5.9) and the welcomes the reference to the role of parish councils (para. 5.6). This has been addressed in the draft Broomfield Neighbourhood Plan (NP).

Q6. What are your views on the Council's current climate change and flood risk local planning policies and the decisions they lead to?

The current policy approach seems rather generalised and ineffective. For instance:

- Policy S4 of the LP has not prevented the development of Grade 2 agricultural land at West Chelmsford and North of Broomfield, despite the availability of alternative locations on lower grade land (see Fig. 6 from the Local Plan below). It is important to protect the best agricultural lands in order to maintain sustainable food supply chains.
- In our experience, a blanket approach to protecting the Green Wedge can make it more difficult to progress cycling and walking routes. A more flexible, localised approach would be welcome
- A greater sense of urgency may be needed. For instance there needs to be a greater willingness to use compulsory purchase orders (CPOs) to help complete infrastructure projects such cycle lanes within a shorter timescale.

Figure 6 : Agricultural Land Classification



Q7. What are your views on the subject areas identified for new policies or significant changes to existing policy?

Broadly support. However, rather than consider large sites for solar/wind energy generation, the Parish Council would prefer a requirement for all new development to include climate-friendly features (e.g. PV panels and small scale turbines). This would be less likely to meet local opposition and could result in faster progress than an emphasis on large generation sites.

Q8. Have we missed anything? Where possible, please support your answer with reference to any evidence.

Planning policies for new development needs to be accompanied by measures to retrofit existing buildings, perhaps by ring-fencing a proportion of CIL for this purpose. Parish councils and community groups could play a role in encouraging this process.

Although it is covered in the following section, for completeness brief reference should be made to the role of boosting sustainable transport in addressing climate change.

Promoting smart, connected active travel and sustainable transport

Q9. Do you agree with the proposed approach being taken? If not, please give the reasons for your answer.

Broadly agree, but there are some key omissions – see our response to Q.11 below.

Q10. Do you have any views on the Council's current local planning policies of relevance to smart, active travel and sustainable transport and the decisions they lead to?

Current planning policies appear to be well-intentioned in this regard, but somewhat superficial and inconsistent. For instance, Local Plan para 4.9 states:

Development will be focused at well-connected locations for example along strategic transport corridors, close to existing local services and in areas with a good level of existing or proposed transport infrastructure including sustainable transport. This will help reduce the need to travel and encourage the use of non-car modes.

However, this has not prevented developments in places with little capacity for sustainable travel infrastructure, such as West Chelmsford and North of Broomfield. Nor has it prevented the withdrawal of important travel infrastructure at a later stage, for instance the West of Chelmsford bus gate, the majority of the Great Waltham to City Centre Cycle Route and now (it seems) the new Broomfield Hospital Access Road. Planning policies have little control over decisions by stakeholders which can lead to infrastructure being withdrawn or losing funding. Developments should not go ahead without agreed transport infrastructure.

Q11. Do you have any views on the areas identified for additional or enhanced policy requirements?

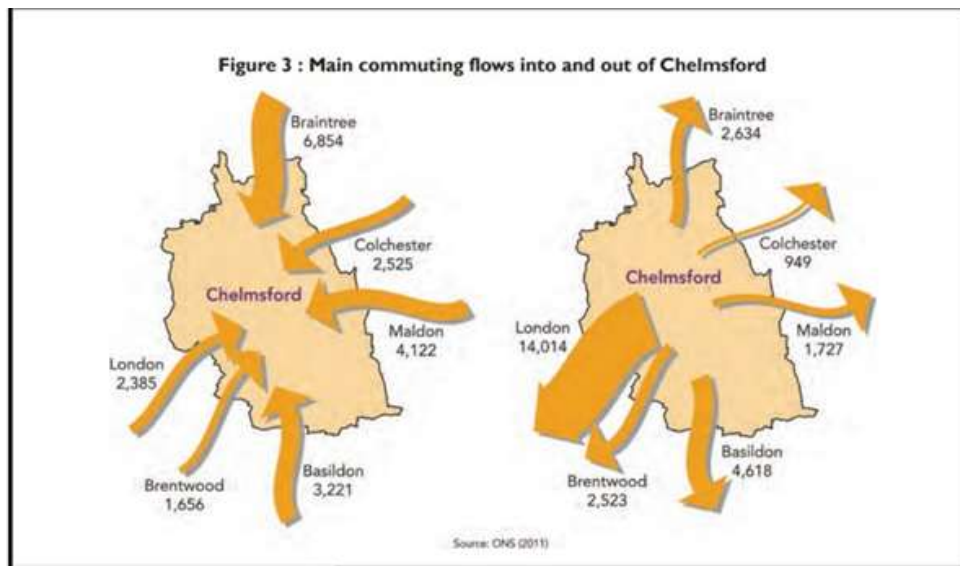
- While measures to improve cycle parking and storage are welcomed (para 5.18), there is no mention of the crucial need for new cycle routes and paths
- A sense of urgency seems to be lacking. To achieve the degree of change needed, there needs to be a radical rebalance to support sustainable transport, for instance lane narrowing to accommodate safe cycle lanes and reduce vehicle speeds. CPOs should be considered where necessary in the same way as for other critical infrastructure
- There is a need for sustainable transport infrastructure to take account of very local opportunities and constraints. This could be recognised in the reviewed Plan, along with the potential role of parish councils in helping to bring infrastructure forward (given the right level of professional support).

Q12. Do you have any views on the proposed ideas for new policies?

15/20 minute walkable neighbourhoods are supported, but their success will depend on buy-in from other stakeholders such as education, employers and retailers.

Q13. Have we missed anything? Where possible, please support your answer with reference to any evidence.

- a) Mention could be made of the role of parish councils in promoting sustainable transport infrastructure, especially those that are preparing neighbourhood plans. They can help to ensure that proposals make sense locally and they can be useful in getting support from local landowners. However, they need officer support and funding. Support needs to be timely, which may require further investment in professional support, particularly from Essex Highways.



- b) Alongside the proposal for 15/20 minute neighbourhoods, there needs to be a greater recognition of the need to locate major new housing developments close to commuting infrastructure. Commuting journeys are likely to be more significant and place greater general strain on the network than trips to local shops etc. Local Plan, Figure 3 shows that the vast majority of out-commuting is to London and other destinations to the south of Chelmsford. Major housing therefore needs to be located close to relevant transport hubs (e.g. the new rail station) and the A12 and A130 (south) corridors. This seems to link to only one of the 5 spatial approaches, but it should be a given for all.

Protecting and enhancing the Natural and Historic Environment, and support an increase in biodiversity and ecological networks

Historic Environment

Q14. Do you agree with the proposed approach being taken? If not, please give the reasons for your answer.

The Parish Council supports the proposed approach. We particularly welcome the key objective 'to enhance and celebrate the historic environment, rather than (*just*) concentrating on preservation or avoiding harm' (para 5.28, *our emphasis*). Through the Broomfield NP, the Parish Council aims to enhance and celebrate the Broomfield Anglo-Saxon Burial and this key objective is supportive.

Q15. Do you have any views on the Council's current local planning policies of relevance to the historic environment and the decisions they lead to?

In the past, there have been some poor decisions in this regard, for instance the siting of a large 'modernist' style care home adjacent to the historic registered Angel Green and neighbouring listed buildings/parkland. Given the variety of architectural and contexts across the district, there needs to be a strong emphasis on local design codes rather than City/district wide codes to avoid such outcomes.

Q16. Have we missed anything? Where possible, please support your answer with reference to any evidence.

No.

Natural Environment

Q17. Do you support the approach to be taken? If you disagree, please explain why?

The Parish Council accepts that the City Council has the important responsibilities set out in para. 5.29. However, the approach places insufficient emphasis on locally valued landscapes when compared with 'elite environments' such as the Essex Coast RAMS area, country parks, the Green Wedge etc. Local communities and parish councils should be encouraged to evaluate and enhance their local landscape and any relevant studies should feed into a City Council strategy to conserve and enhance valued landscapes. This has the potential to encourage local communities to enjoy leisure and active exercise close to their homes, rather than travelling to county parks and other elite environments.

The Parish Council has followed this approach in preparing its NP, commissioning professional studies to understand the sensitivities of both the Upper Chelmer Valley and Pleshey Farmland Plateau landscape character areas. Where NPs are willing to follow this approach, they should be given flexibility in applying it to spatial planning.

Q18. Do you have any views on the Council's current local planning policies of relevance to the natural environment and the decisions they lead to?

The current approach seems appears to lead to blanket protection of some areas, such as the Green Wedge, which inevitably pushes major development on to other important or valued landscapes, such as some of the farmland plateaus (which are often the highest grade agricultural land). This approach seems to add to problems associated with the Green Belt i.e. that some sustainable development in lower value landscape is prohibited by a 'top down' blanket policy. It also tends to lead to 'cliff-edges' - a local example in Broomfield being the Green Wedge, which stops at the B1008, leaving land to the west relatively unprotected, despite important landscape sensitivity and high-quality agricultural land.

As indicated above, the Parish Council would prefer a more granular approach where parishes and local communities are empowered to take their own evidence-based decisions about the value of local landscapes and their sensitivity/capacity to absorb development.

Q19. Do you have any views on the proposed ideas for new policies?

The Parish Council supports the requirement for 20% net biodiversity gain. We also support the recurring reference to the Green Wedge providing opportunities for cycling, walking and wildlife (para 5.30 and earlier at para. 2.53 Key Opportunities). As confirmed later in the document, this is a shift of emphasis away from seeing the Green Wedge as primarily a 'mini-Green Belt' and is welcomed.

Q20. Have we missed anything? Where possible, please support your answer with reference to any evidence.

As indicated, there is also a need to support local communities and parishes to identify and enhance local biodiversity and landscape assets.

Ensuring sustainable patterns of development and protecting the Green Belt

Countryside

Q21. Do you support the approach to be taken? If you disagree, please explain why?

Yes. Community feedback for the Broomfield NP shows the overriding importance of the countryside for local people. The Parish Council supports a robust approach to conserving the intrinsic beauty of the

countryside and has included more detailed policies in the draft NP to support Local Plan policies in this regard.

As indicated above, the Parish Council strongly supports the emphasis on a broader role for the Green Wedge, which reflects the aspiration for new cycle and footpaths in its draft NP.

Q22. Do you have any views on the Council's current local planning policies of relevance to the countryside and the decisions they lead to?

Our response to Q.18 also relates to this question:

'The current approach seems appears to lead to blanket protection of some areas, such as the Green Wedge, which inevitably pushes major development on to other important valued landscapes, such as some of the farmland plateaus (which are often the highest grade agricultural land). This approach seems to add to issues associated with the Green Belt i.e. that some sustainable development in lower value landscape is prohibited by a 'top down' blanket policy. It also tends to lead to 'cliff-edges', a local example in Broomfield being the Green Wedge, which stops at the B1008, leaving land to the west relatively unprotected despite important landscape sensitivity and high quality agricultural land.'

Q23. Have we missed anything? Where possible, please support your answer with reference to any evidence.

As indicated above, the Parish Council would like the proposed approach to be broadened to include a more granular approach, where parishes and local communities are empowered to take their own evidence-based decisions about the value of local landscapes and their sensitivity/capacity to absorb development. Specific mention could be made of the role of NPs in this regard.

Special Policy Areas (SPAs)

Q24. Do you agree with the proposed approach being taken? If not, please give the reasons for your answer.

Broadly agree.

Q25. Do you have any views on the Council's current Special Policy Areas and the decisions they lead to?

Currently, there appears to be a danger of SPAs developing separately from the wider context of their adjoining area. For instance, the Broomfield Hospital site is a major generator of traffic, which exacerbates problems with congestion and parking outside the SPA. SPA masterplans etc should be developed in consultation with local communities. SPA policy should include a commitment to resolve issues resulting from activity within the SPA, wherever possible, even where these occur primarily outside the SPA.

Q26. Are there any additional Special Policy Areas you think should be added? Where possible, please support your answer with reference to any evidence.

No

Q27. Have we missed anything? Where possible, please support your answer with reference to any evidence.

As indicated, there is need to see SPAs in context of their wider area. SPAs should consider how they might mitigate issues outside their boundary where these are the consequence of activity within the SPA.

Meeting the needs for new homes

Housing

Q28. Do you support the approach being taken? If you disagree, please explain why?

a) The minimum requirement and the Buffer

The PC supports the attempt to rebalance provision between ordinary market housing and housing for specific groups, such as those unable to afford market prices or rents; and those requiring specific types of housing which the market may not normally provide. It also supports the aim to ensure that the type and size of housing matches local need.

However, it is not clear that simply increasing the buffer is the best way to achieve this. In effect, the proposed approach introduces 2 buffers:

- First by increasing the existing requirement from 966 dpa to 1,000 dpa (para. 5.54); or, if you take the minimum requirement of the national standard method (para 5.55), from 946 dpa to 1,000 dpa. This is in effect a small buffer of between 3.5% and 6.76%
- Second by applying a 20% buffer to the increased figure of 1,000 dpa.

Under the existing Local Plan, there was an argument in favour of a large 20% buffer because the new national method was anticipated but had not yet been introduced. Now that it has, it is questionable whether the buffer needs to be as large as 20%, since one significant uncertainty has been removed.

The Parish Council is also unclear whether having a 'headline buffer' of a certain percentage will necessarily help to achieve the specialist/affordable types of housing that the City Council wants to secure. Could it in fact simply increase the basic requirement and thereby simply increase the requirement for market housing? The Parish Council would prefer a more targeted approach that can guarantee that the additional housing secured does meet the real needs of specific groups. One way of providing genuinely affordable housing would be through the use of Community Land Trusts (CLTs). The Parish Council is proposing in its draft NP to establish one for Broomfield to help meet the acute need for affordable housing for local people. CLTs may be a better way for the City Council to achieve its aims.

The Parish Council does not support the use of the Buffer to help meet basic need from neighbouring authorities that are constrained by Green Belt. Such authorities should look to secure their own land supply, if necessary through a review of their Green Belt boundaries.

b) Sites of max 1 hectare

The Parish Council is sympathetic to the requirement that 10% of the housing requirement should be provided on such sites, as opposed to large greenfield sites because:

- It is more in tune with the views of our community, as seen in our NP residents' questionnaire
- It is easier for villages to assimilate smaller housing developments than large greenfield sites.

However the Parish Council would prefer the definition of such sites to be 'around 1 hectare' rather than 'up to 1 hectare' in order to avoid a cliff-edge.

Q29. Do you have any views on the Council's current housing policies and the decisions they lead to?

The current approach seems very 'top-down' with all developments of more than 100 dwellings allocated as strategic sites. This appears to favour large commercial developers and does not necessarily lead to infrastructure being delivered. For instance, the 'North of Broomfield' development has not been able to secure an effective cycle path into the City Centre; and now appears unlikely to deliver the promised

second access road to Broomfield Hospital either. Similarly, the 'West of Chelmsford' development has not delivered promised bus links with the existing urban area.

Whilst accepting the need for the very largest sites (1,000 + dwellings?) to be strategic and allocated through the Local Plan, there is a strong argument for a more local, granular approach in relation to other sites, particularly in communities that are preparing or have adopted neighbourhood plans, with support from City and County officers. This could help to ensure that development is located in the most appropriate locations and that infrastructure requirements are best suited to local circumstances.

Q30. Should we be considering any alternative options for a housing supply buffer?

Yes – please see our reservations about the housing supply buffer in our response to Q.28 above. CLTs, rural exception sites and the proposal for 'affordable housing sites adjacent to settlement boundaries' offer a better and more targeted way of meeting need than simply increasing the Buffer.

The Parish Council would like the list of parishes eligible for rural exception sites to be extended to include larger villages.

Q31. Do you have any views on the proposed ideas for new policies or significant changes?

Housing Requirement for Designated Neighbourhood Areas

The Parish Council is sympathetic to this suggestion, but only if it is applied to all neighbourhoods according to a common formula **and** replaces the current approach where developments of more than 100 dwellings are allocated as strategic sites through the Local Plan. There would also need to be a greater level of discretion about how neighbourhoods could identify appropriate development sites.

Q32. Have we missed anything? Where possible, please support your answer with reference to any evidence.

For the moment, the Parish Council believes that all issues have been raised. However, with so much work ongoing regarding housing requirement and land supply, we would wish to reserve our position to comment further when that work is complete.

Gypsy and Traveller Accommodation

Q33. Do you support the approach being taken? If you disagree, please explain why?

No comment.

Q34. Do you have any views on the Council's current Gypsy, Traveller and Travelling Showpeople policies and the decisions they lead to?

No comment.

Q35. Have we missed anything? Where possible, please support your answer with reference to any evidence.

No comment.

Fostering growth and investment and providing new jobs

Jobs/Employment and Economic Growth

Q36. Do you support the approach being taken? If you disagree, please explain why?

Yes. Parish councils and village halls may have a role in supporting home-working by providing affordable meeting rooms for home workers, to enable networking and reduce the danger of social isolation. This could be noted in the text.

Q37. Do you have any views on the Council's current employment policies and the decisions they lead to?

No comment.

Q38. Do you have any views on the key economic and employment related issues identified so far?

No comment.

Q39. Have we missed anything? Where possible, please support your answer with reference to any evidence.

No comment.

Creating well designed and attractive places, and promoting the health and social wellbeing of communities

Community assets

Q40. Do you support the approach being taken? If you disagree, please explain why?

Yes

Q41. Do you have any views on the Council's current community asset policies and the decisions they lead to?

No comment.

Q42. Have we missed anything? Where possible, please support your answer with reference to any evidence.

No comment.

Design

Q43. Do you support the approach being taken? If you disagree, please explain why?

Whilst addressing design issues connected with healthy lifestyles very well, the approach seems to under-emphasise the more obvious issues about architectural design and design codes. These raise important issues that need careful consideration in the reviewed Local Plan, for instance:

- The importance of the historic environment
- Where design has been poor in the past, how new development can improve upon it whilst broadly in keeping with its surroundings
- How local design codes are agreed
- How local communities, including parish councils, can be resourced and skilled to lead this process.

Q44. Do you have any views on the Council's current design policies and the decisions they lead to?

Current design policies seem to work best in extensive, master planned areas. They seem less successful in single or small developments, yet these can have a huge impact where they fail to blend positively with their surroundings. Please see our local example (quoted above) of a large 'modernist' care home inserted

alongside an historic village green, to which it relates poorly in terms of scale, alignment and architectural design.

Q45. What would you consider to be 'beautiful' in terms of development?

To some extent, beauty is in the eye of the beholder. Nonetheless, the Parish Council believes that notions of beauty should reflect the democratic views of the local community. The role of architects and other professionals should be to interact with popular views of beauty, rather than simply override them.

With that in mind, our NP Residents' Questionnaire revealed the following views about design. When offered some different views about the design and planning of buildings, the following got the most support (though not necessarily over 50%):

- new buildings should fit in with surrounding buildings, provided the surrounding buildings look attractive;
- generally new buildings should be of traditional design;
- new houses should be spread out, with plenty of space in between;
- generally new houses and buildings should be limited to 2 storeys - blocks of apartments are not acceptable;
- smaller gardens are okay, provided there is communal open space within 2 minutes' walk;
- new houses should generally be built in small cul-de-sacs, with a maximum of around 25 houses in each.

Our NP Design Guide (AECOM, 2019) requires the following design standards:

- A. Harmonise and enhance existing settlement in terms of physical form pattern or movement and land use.
- B. Relate well to local topography and landscape features, including prominent ridge lines.
- C. Reinforce or enhance the established urban character of streets, squares and other spaces.
- D. Reflect, respect and reinforce local architecture and historic distinctiveness.
- E. Retain and incorporate important existing features into the development.
- F. Respect surrounding buildings in terms of scale, height, form and massing.
- G. Adopt appropriate materials and details.
- H. Integrate with existing paths, streets, circulation networks and patterns of activity.
- I. Provide adequate open space for the development in terms of both quantity and quality.
- J. Incorporate necessary services and drainage infrastructure without causing unacceptable harm to retained features.
- K. Ensure all components e.g. buildings, landscapes, access routes, parking and open space are well related to each other, to provide a safe and attractive environment.
- L. Make sufficient provision for sustainable waste management (including facilities for kerbside collection, waste separation and minimisation where appropriate) without adverse impact on the street scene, the local landscape or the amenities of neighbours.

Q46. Do you have any views on the proposed ideas for new policies or significant changes?

As indicated above, a greater emphasis should be placed on local design codes in creating and maintaining a sense of place.

Q47. Have we missed anything? Where possible, please support your answer with reference to any evidence.

Reference could be made to village design statements. These are a good vehicle for ensuring democratic input to design codes and for ensuring they are locally based, helping to ensure variety of design across the district as a whole.

Delivering new and improved infrastructure to support growth

Q48. Do you support the approach to be taken? If you disagree, please explain why?

Yes.

Q49. Do you have any views on the Council's current infrastructure policies and the decisions they lead to?

Achieving infrastructure, especially major projects, is hugely complex and challenging. The City and County Councils and their partners should be congratulated on the progress made on the north-east bypass and the new Beaulieu station (although there is still some way to go before completion). In particular, the new rail station will be a massive achievement that will enable a more sustainable growth strategy for the future and will have benefits across the City.

Inevitably, some infrastructure policies have been less successful. In Broomfield, the failure to achieve the full Great Waltham to City Centre Cycle Route will increase congestion on the B1008 corridor (already at 96% capacity at peak times). The decision to restrict the new Hospital Access Road first to staff and now (it seems) to drop it altogether raises the prospect that there may be no new immediately-adjacent infrastructure to mitigate the impact of SGS8 'North of Broomfield' on this highly congested corridor. Whilst the north-east bypass should bring indirect relief, the degree of relief will depend on interventions to make the B1008 less attractive to through traffic. The lesson is to ensure that the agendas of all stakeholders (including in this case the Mid and South Essex NHS Foundation Trust) align before major development is planned.

Q50. Have we missed anything? Where possible, please support your answer with reference to any evidence.

Para 5.102 presents a somewhat rosy picture of the challenges in achieving local infrastructure to support growth. For instance, expanding primary schools is far from straightforward, as we have seen in Broomfield with the failure to build a new primary school on a new site, as originally planned in the NCAAP. Site constraints often mean that primary schools cannot be expanded even when there is funding to do so.

Retrofitting existing roads to include cycle lanes, bus lanes etc is also extremely difficult (ref. B1008 again) and even creating new retail and hospitality venues depends on alignment with the business plans of commercial partners.

The Parish Council therefore believes that this section understates the value of new garden communities, such as Hammonds Farm, where new infrastructure can be master planned from the outset. This is partly why the Parish Council supports inclusion of Hammonds Farm in the Reviewed Local Plan, in preference to more sporadic growth in Key Service Settlements.

Encouraging resilience in retail, leisure, commercial and cultural development

Retail and Designated Centres

Q51. Do you support the approach to be taken? If you disagree, please explain why?

Yes

Q52. Do you have any views on the Council's current retail policies and the decisions they lead to?

No comment.

Q53. Have we missed anything? Where possible, please support your answer with reference to any evidence.

No comment.

Encouraging resilience in leisure, commercial and cultural development

Q54. Do you support the approach to be taken? If you disagree, please explain why?

No comment.

Q55. Do you have any views on the Council's current leisure, commercial and cultural policies and the decisions they lead to?

No comment.

Q56. Have we missed anything? Where possible, please support your answer with reference to any evidence.

No comment.

Spatial Principles

Q57. Do you agree with the proposed updates to the Spatial Principles? If not, please give the reasons for your answer. Please refer to the Spatial Principle number in Table 7.

The Parish Council supports all the proposed updates except for e) Focus development at the higher order settlements outside the Green Belt and respect the development pattern and hierarchy of other settlements. We have set out our reasons in our response to Q. 61.

The Parish Council supports the additional references to reducing carbon emissions (g) and protecting the Green Belt from *inappropriate development*, as opposed to all development (b).

Q58. Are there any Spatial Principles you think should be added? Where possible, please support your answer with reference to any evidence.

No comment

Spatial Strategy

Q59. Do you support the changes to the methodology and criteria note of the Strategic Housing and Employment Land Availability Assessment (SHELAA)? If you disagree, please explain why?

We cannot see where these changes are set out, so are unable to agree or disagree.

Q60. Do you support the approach to be taken to review the Spatial Strategy? If you disagree, please explain why?

Para 6.12 says 'we have reviewed our approach' but it is rather unclear whether this review is a fundamental review (e.g. is the existing Strategy still appropriate?) or whether it is just monitoring the outcomes of the Strategy so far and applying the same Strategy to updated circumstances (i.e. the requirement to find more land for development).

The Parish Council supports a more fundamental re-alignment of the Spatial Strategy because:

- a) There is now an even greater national emphasis on the need to reduce carbon emissions through transport; and a greater emphasis on well-being and quality of life;
- b) The new Vision is different: it is not so much about 'cementing the existing successes ..from growth' and from new City Status; and more about achieving 'a greener, fairer and more connected community' (a shift which the Parish Council welcomes); and
- c) The Parish Council had significant concerns about the previous Spatial Strategy, especially the use of a Settlement Hierarchy to determine the location of sustainable development (see Q.61 below).

In more detailed terms, it is of concern that 4 of the 5 suggested approaches include expansion of existing allocated sites. The Parish Council hopes this is not indicative of a 'business as usual' approach to the Spatial Strategy, given the urgent need to re-balance transport in a more sustainable direction.

Q61. Do you agree with the scope and classification of individual settlements within the Settlement Hierarchy? If you disagree, please explain why? Where possible, please support your answer with reference to any evidence.

The Parish Council fundamentally disagrees with using the Settlement Hierarchy to identify the most sustainable development locations. Whilst this may work well for Chelmsford City Centre and potentially South Woodham Ferrers due to the greater number of facilities within walking distance, the model breaks down once it applies to other settlements.

Our reasons are as follows:

a) Hierarchical classification between key and ordinary settlement is subjective.

It is difficult to compare settlements. For instance, Broomfield, Great Waltham and Little Waltham all contain at least one pub, a village hall, sports facilities, churches and a primary school. Little Waltham has a surgery and pharmacy but no village shop. Broomfield hosts the local secondary school, but this serves all the nearby villages. It also hosts the City's largest employer, Broomfield Hospital, but this is clearly a facility for the whole of mid-Essex. Arguably, it is less important as a local facility than having a GP surgery and pharmacy, like Little Waltham. So, it is very difficult to compare even these 3 adjacent settlements.

Whilst it is true that some villages are bigger than others, every village has a slightly different offer. A classification system is relatively harmless if it is purely for administrative convenience, but it is not a robust or reliable basis for identifying sustainable development locations.

b) Size and Number of Facilities is not a Guide to Future Capacity

Key service settlements may have more facilities than service settlements or small settlements, but that does not mean they necessarily have the capacity to expand. For instance, Broomfield Primary School has recently been expanded to 2 forms of entry on its existing site, which is now full. Therefore, significant expansion of Broomfield would need a new primary school – in which case Broomfield is no different to a smaller settlement that currently has no primary school.

Also, it cannot be assumed that more development will lead to an expansion of facilities. It is far more complicated and depends on the aims and agendas of providers. For instance, the 'North of Hospital Approach' development in Broomfield was supposed to include a GP surgery, but the NHS agenda was to have larger surgeries – so the surgery never happened and Little Waltham surgery was expanded instead (in which case, the development should perhaps have taken place in Little Waltham). Even market driven facilities such as shops and pubs may not necessarily be able to expand to accommodate new housing if there are other constraints at play.

The danger of this over-simplified classification process is that development is allocated without due consideration of the ability of facilities in Key Service Settlements to expand. Problems tend to emerge only at a later stage. A much better approach is therefore to audit the capacity of key providers to expand, and whether such expansion is compatible with their business plans, **before** deciding if a location is sustainable. A mechanistic approach based on an existing/historical hierarchy is not fit for purpose.

c) Development can be an opportunity for small settlements to create or sustain facilities

As stated above, every village is different. For some small villages, new development could lead to a new shop opening or a struggling shop being sustained – likewise for preschools and potentially even primary schools. This will not always be the case but, again, a more evidence-based approach to identifying need and opportunity is required.

d) Good transport infrastructure is a more important consideration than settlement hierarchy

A mechanistic settlement hierarchy takes no account of transport infrastructure capacity. Regular commuting to work exerts greater pressure on the transport network than more occasional journeys to the local shops. Given the out-commuting patterns illustrated in Fig.3 of the Adopted Local Plan, proximity to rail stations and to the A12 and A130 (south) corridors is clearly a far more important consideration.

It is true that one Key Service Settlement – Boreham – is close to the new rail station and is on the A12/A130 corridor. However, that is co-incidental. Most such well-located settlements are classified in the hierarchy as mere 'settlements' and one (Rettendon Place) as a service settlement.

e) Settlement hierarchy demonstrates a poor correlation with final decisions about the location of development

The Parish Council understands that allocations to Key Service Settlements outside the Green Belt in the Adopted Local Plan are as follows:

Great Leighs: 1,100 (including x added at appeal)

Broomfield: around 450 (in addition to ongoing development allocated through the previous LDF)

Boreham: 145 (all added through appeal)

Bicknacre: TBC

Danbury: 100 (to be allocated through a neighbourhood plan, not the Local Plan).

If Key Service Settlement status is an important consideration, clearly one would expect the allocations to each Key Service Settlement to be broadly similar, at least before the effect of successful appeals. That it is not can only mean either:

- The concept is not robust; or
- Other factors, unconnected with settlement hierarchy, are ultimately considered to be more important.

Either way, the approach to using settlement status to allocate new development is at best inconclusive and unhelpful, so should be ditched.

In conclusion, for the reasons set out above, **the Parish Council requests that the Settlement Hierarchy set out in Table 8 (p.89/90) is no longer used to determine locations for sustainable development.**

Q62. How do you feel about the types of locations for potential housing development growth (growth in urban areas, expanding allocated sites, growth along transport corridors, development at larger villages, development at smaller villages, large new settlement/garden community)? Please indicate whether you strongly support, support, neither oppose or support, oppose, strongly oppose. Have we missed anything?

Growth in urban areas

Broadly **support**, on the basis that urban areas provide easy access to a range of facilities, from stations to small shops.

Expanding allocated sites

Broadly **oppose**. The capacity of allocated sites was determined through a rigorous process, including independent examination, so they should only be expanded where fresh study demonstrates there are clear benefits for service provision and that constraints (such as roads) allow. It should certainly not be the default position to simply expand allocated sites.

Growth along major transport corridors

Strongly support, especially where these include sustainable transport such as rail. Even where commuting continues to be by car (which is to some extent inevitable), it is better for new housing development to be close to road transport corridors. If it away from such corridors, it simply means that local roads will be congested and slow moving, and major transport corridors such as the A12 will still need to be accessed eventually.

Development at larger villages and Development at smaller villages

As indicated in the Parish Councils response to Q.61, the size of the village is irrelevant. All villages should be audited to see if development would be sustainable – could facilities be created/maintained though development, do existing facilities have the capacity to expand etc? Each village is different, so the Parish Council neither **opposes or supports**. However, we **strongly oppose** the idea that larger villages should be expanded simply because they are larger.

Large new settlements/garden communities.

Strongly support, particularly where they are located on good transport corridors.

The Parish Council strongly supports the concept of Hammonds Farm. It has all the advantages of a garden community, plus it is located close to the new Beaulieu rail station and is well-located for the A12 and A130. It would also avoid the need for a massive expansion of Boreham village, which would otherwise seem inevitable due to its proximity to the new rail station and the A12.

The Parish Council does not see any difficulty with developing two garden villages concurrently as they would be at different stages. Hammonds Farm would be at an earlier stage of development than North-East Chelmsford Garden Village and would continue into the following Plan Review period. As we understand it, the promoters/consortia are different and have different approaches. It is confusing and unfortunate that Approach E is currently regarded as the least favourable approach when this appears to be for purely procedural reasons (i.e. that it is an appraisal of the current position rather than the position if the development took place). The Parish Council very much hopes that the appraisal can be updated as soon as possible to reflect the likely position going forward.

Q63. Are there any Spatial Approaches that the Council has missed?

The Parish Council appreciate that the 5 Approaches are examples not definite proposals. The Council appreciates the wider range of approaches when compared with the same stage of the Adopted Plan consultation.

That said, there are some features that crop up in more than one option:

- expansion of East and West Chelmsford allocated sites (Approaches A, B, C and D)
- expansion of 'Key Service Settlements' (Approaches A and C).

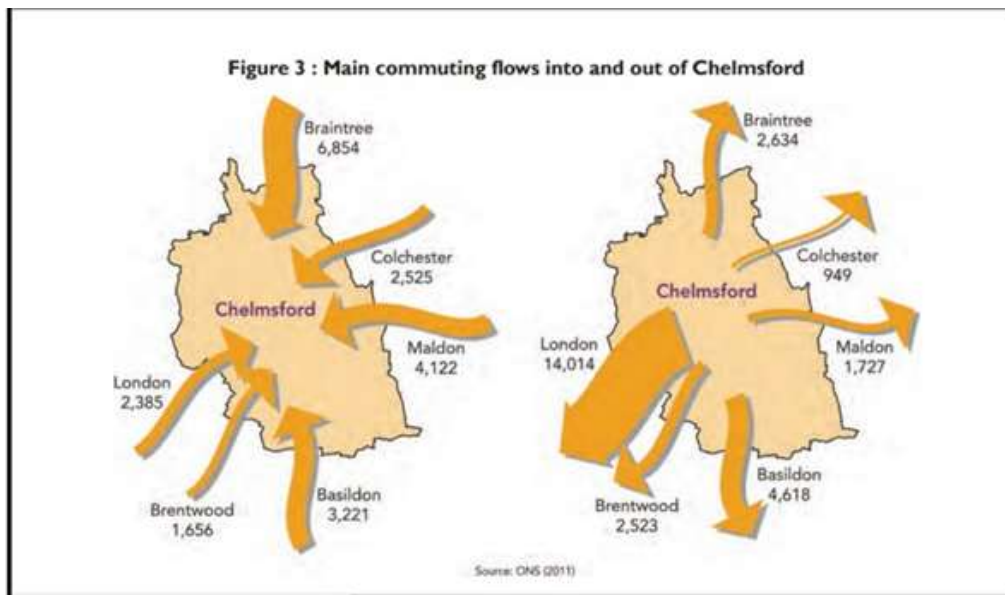
Please note the Council's opposition to these features, as outlined above.

The Parish Council is most opposed to Approaches A and C. Its preference is for a blend of Approaches B, D and E - which we outline below as Approach F.

Broomfield Parish Council's 'Approach F'

This Approach is also illustrative. It shows how Approach D (exploring growth along transport corridors) could be extended, to include Hammonds Farm (which is also located along main transport corridors), whilst still maximising use of brownfield sites by concentrating growth in urban areas (Approach B).

Clearly, this would over-provide housing, so not all the locations would be needed or locations would not need to be developed to the maximum extent shown in Approaches A to E.



By including development in the City Centre, North-East Chelmsford and Hammonds Farm, this Approach makes the best use of rail infrastructure, whilst also locating development where it can access the A12 and A130 corridors. Only a major Green Belt release south-west of Chelmsford would be arguably more sustainable.

Great Leighs and Chatham Green are excluded from this Approach, as Fig.3 indicates that commuting from the north (Braintree) is already the busiest incoming route (and it is likely to be by car).

Further expansion of West Chelmsford is also excluded, as there is no evidence that transport infrastructure is sufficient to meet any further expansion.

Further expansion of East Chelmsford has not been shown, as development could be provided more sustainably close by at Hammonds Farm. It could however be added in again if required (for instance if Hammonds Farm did not go ahead).

Development standards

Q64. Do you support the approach being taken? If you disagree, please explain why?

Yes

Q65. Do you have any views on the Council's current development standards and the decisions they lead to?

No comment

Q66. Are any development standards missing, should anything be changed or do some standards require further clarification to aid interpretation? Where possible, please support your answer with reference to any evidence.

No comment.

Broomfield Parish Council

October 2022