

BROOMFIELD PARISH COUNCIL

COMMENTS ON PLANNING APPLICATION 23/01487/FUL

Retrospective Application for change of use of land to Showmen's Permanent Quarters

1. Introduction

Broomfield Parish Council ('the Council') welcomes the opportunity to comment on this application. It has caused significant concern for residents, due to the sudden implementation of the development prior to any planning consent, as well as to the principle of development in a protected area. However, the Council's objections below focus directly on planning considerations rather than the understandable feelings of concern within the local community.

2. The Green Wedge

The development site lies well within the designated Green Wedge where Strategic Policy S11, part B, states that:

'Development which materially harms the role, function and intrinsic character and beauty of the Green Wedge will not be approved.'

The application points out by reference to a number of landscape assessments that this southern section of the Chelmer Valley Green Wedge does not have the same quality of landscape as other parts of the Green Wedge to the north. It also notes that the site is on land that has not been professionally judged to be a 'Valued Landscape' in the Broomfield Neighbourhood Plan (NP) evidence base. However, this is to miss the point that the Green Wedge is a 'multi-faceted' landscape, serving a number of purposes and functions. It is not simply about 'intrinsic beauty'. Chief amongst its functions is the prevention of '*urban sprawl and settlement coalescence*'; as well as opportunities for '*leisure and recreation and travel by cycling and walking*' (see section 5 below for the latter).

In this section of the Green Wedge, the buildings of Roselawn Farm already present a prominent salient of settlement area into the Green Wedge. The proposed site would be a further significant intrusion into the central part of the Green Wedge between the Ambulance Station and Springfield to the east; and the Vellacotts/Ashford Place area of Broomfield to the west. The degree of separation between settlement areas is already fairly narrow and, as the LVA accompanying the application points out, the functions of the Green Wedge are already rather jeopardized here by a number of urbanizing influences, such as a phone masts, fences, farm buildings, perimeter walls and security paraphernalia associated with Roselawn Farm.

By penetrating further into the central part of the Green Wedge, the proposed development would therefore significantly increase the degree of '*urban sprawl and settlement coalescence*', directly contrary to Policy S11b of the adopted Local Plan. If such a development were approved, there would be no grounds to refuse applications in more peripheral areas of the Green Wedge, such as (in Broomfield) at Campions Farm, further undermining the purpose of the strategic policy. The application therefore cannot be supported, on the basis of its impact on the Green Wedge alone.

3. Landscape and Visual

The application is accompanied by a Landscape and Visual Appraisal (LVA). This document makes clear it is not a Landscape and Visual Impact Assessment (LVIA) so '*does not assess the significance of the impacts*' (para. 1.3).

a) Reference to Other Landscape Appraisals

The application makes reference *inter alia* to the Broomfield NP Landscape Appraisal, in particular to the professional judgement that '*the nature of valley topography and gentle knowle of higher land south of Roselawn Farm presents some opportunity for a carefully thought through extension of the urban edge*' in the general area. However, the application is rather confused about the exact geography of the area. The proposed development site lies not on the edge of the settlement, but to the south-east of the 'gentle knowle'. The NP Landscape Appraisal makes clear that any '*development should be set back behind (i.e. to the west of) the slight knowle or rise in land south of Roselawn Farm ...*'. Further, the NP Appraisal states that any development must ensure that '*from the elevated knowle opportunities for viewing the wider valley are embraced*'. The proposed development would be directly at the forefront of these wider valley views when seen from the 'gentle knowle.' The application therefore does not conform with the NP Landscape Appraisal.

b) Visual Impact of Homes, Equipment and Vehicles

The LVA refers to the amount of screening provided by vegetation around the proposed site and that this could be enhanced by new hedgerow planting. However, this seems to relate mainly to the low-level dwellings themselves, whereas Policy DM3 of the adopted Local Plan makes rightly states that new plots for travelling showpeople must '*enable the storage, repair and maintenance of equipment.*'

Indeed, the Design and Access Statement, para. 2.2.3, specifically states that '*increases in the size of vehicles and rides*' and the consequent need to store them over several sites is one of the reasons why new accommodation is sought. This is rather at odds with the assertion in the LVA that '*HGVs and fairground equipment at the site ... are single storey and small scale*' (Para 4.39).

Clearly the visual impact of equipment and vehicles is important and could be greater than the impact of the dwellings themselves. Para 4.46 of the LVA acknowledges this, but makes only passing reference, suggesting that '*with a backdrop of the commercial area the changes due to the Proposals will be limited.*' This is hardly a ringing endorsement of the proposals and, in any event, the commercial area will only provide a backdrop when the site is viewed from the south.

Finally, the LVA also seems confused in its assertion that for most of the year '*there will be no homes upon the site*' (also para 4.39). Para. 5.3 of the Design and Access Statement makes clear accommodation on the plots will include '*residential chalets*' – indeed, local residents reported seeing these being transported on to the site in September. These inconsistencies all give the impression that the LVA has only a limited grasp of what is actually being proposed/already on site; and that consequently its reassuring conclusions are of limited value.

4. Traffic, Transport and Access

a) General Traffic Issues

Broomfield sits astride the B1008, which is classed as a Principal Route One (PR1) – a major route into Chelmsford City Centre from the north. It also forms the only road access to Broomfield Hospital, the City's general hospital and largest employer. The B1008 is therefore a key route for emergency vehicles.

The result is extreme congestion at peak times. The B1008 is at 96% capacity, one of the most congested routes in Chelmsford. This is evidenced in a range of professional studies, for instance:

- The Broomfield Corridor & Access to Broomfield Hospital Study 2007 (Commissioned by ECC from Mouchel)
- The Local Plan Evidence Base, Strategic & Local Junction Modelling - Preferred Option Addendum-2 February 2018
- A study by TTHC, commissioned by the Council and neighbouring parish councils to examine the impact of Local Plan sites 2018 and subsequently updated.

Furthermore, pressure on the B1008 Main Road will increase during the next few years due to the construction of the growth site 'north of Broomfield' (512 dwellings) which has been allocated in the Local Plan.

It is therefore critical that any new development mitigates its impact on the B1008. Potential traffic mitigation measures are outlined in the Broomfield NP (in section 12 of the NP and in: <https://www.broomfieldnp.org.uk/UserFiles/Files/Evidence%20and%20Documents/maps%20of%20suggested%20traffic%20improvements.pdf>). In the case of a development on the eastern side of the village, relevant measures could include funding a signalized junction at the junction of Main Road, Ashford Place and Erick Avenue; and the provision of a right of access across land in the Chelmer Valley to support a new cycle and foot path from Valley Bridge to Mill Lane. This right of access is almost complete, as 5 of the 6 landowners in the Chelmer Valley (between Valley Bridge and Mill Lane) are willing in principle.

The Council notes there are no measures proposed in the application to mitigate traffic impact on the B1008. The expected increase of 92 two-way vehicle movements per day compared to the current 160 generated by all uses at Roselawn Farm represents a sizeable increase of 58%. This would mainly take effect during winter months when general traffic flows are likely to be heavier and conditions worse due to winter weather.

Given the existing pressures outlined above, there is no scope for even modest increases to be generated by a development without appropriate mitigation.

b) Specific Access Issues

Currently, access to Roselawn Farm is via Saxon Way and an agricultural track across the field to the east. Both are unmade and belong to several different landowners. Several new properties face on to Saxon Way, though their vehicular access is from behind, from Ashford Place.

In the Council's opinion, the current access is completely unsatisfactory even for current usage. Any new development accessed from Saxon Way would need to positively address this problem rather than simply adding pressure to the existing unsatisfactory arrangement.

In particular, residents have drawn the Council's attention to the impact of heavy lorries using the current access, creating a lot of dust in dry weather. It seems likely that use by heavy lorries would increase if the application were approved, albeit at particular times of the year, making these problems worse. This would undermine the proper and healthy enjoyment of their residential amenity, so would be contrary to Policy DM3, A, vii. of the Local Plan. Further, it should be noted that there is a weight restriction on Main Road, which suggests that it is not considered generally suitable for heavy vehicles.

The Council therefore cannot support the application on traffic and access grounds, as well as those already outlined above.

5. Reference to Policies in the emerging Broomfield Neighbourhood Plan (NP)

The application notes that the Broomfield NP is currently 'emerging' and has not yet been independently examined, so its policies are not yet a material consideration. Nonetheless, Policy BFD4 is cited to support the development with regard to the proposed additional planting around the site. However, this policy is a requirement for new developments in general rather than a justification for any particular development proposal.

Further, the Council notes that the proposals are completely contrary to Policy BFD6 of the emerging NP. This policy seeks to support the role of the Green Wedge in furthering *'leisure and recreation, and travel by cycling and walking (and)... good public access'* (LP Policy S11B). Community Action CA14 also outlines a strategy for encouraging a cycle and foot path network, including through the Chelmer Valley. It is an important consideration in a section of the Green Wedge where there is currently no such opportunity for leisure, public access etc. However, in contrast, the application seems to conclude that because there is no public access, there is no amenity to be lost. This completely misses the point of policy BFD6 and CA14 and therefore the emerging NP cannot be used to support the current application.

6. Archaeology

The development site is adjacent to the field at the eastern end of Saxon Way where an Anglo-Saxon princely burial was discovered during gravel extraction in the 1880s. It is a nationally significant site.

During further gravel excavation in the 1980s, a watching brief was maintained which found some evidence of Saxon occupation in the eastern part of the field (closest to the development site). It is assumed that there was a settlement linked to the burial, though its location is still unknown.

The application states that no archaeology was discovered during the digging of a pipeline across the development site in 2005. However, that was only a linear feature and not a substitute for a thorough archaeological appraisal. Given its proximity to such a significant site, an appraisal and written scheme of investigation if necessary should have been presented with the application.

7. School Places

Broomfield Primary School has recently been expanded to meet a shortfall in local places and to contribute to meeting the demand arising from the 'north of Broomfield' strategic site. Despite this expansion, the Council understands that the School continues to be oversubscribed and is full in most year groups.

It is important that all children in the local community can attend their local school if their parents wish. There is no evidence in the application to quantify the likely numbers of primary and secondary school children and whether the need for places can be met.

8. Need Case

Section 2 of the Design and Access Statement outlines underprovision of plots for Travelling Showpeople in Thurrock, stating a need for about 200 additional plots by 2033. Paragraphs 5.14 and 5.15 then seek to link the obligation to provide additional places in Thurrock to this proposed site in Broomfield, citing the duty of planning authorities to co-operate where necessary on strategic planning issues.

Paragraph 5.15 speculates that Thurrock may struggle to meet its identified need in this regard due to the large proportion of Metropolitan Green Belt land (a similar argument could also be made for Chelmsford). However, no hard evidence is presented to show that Thurrock cannot meet its identified need.

For the duty to co-operate to come into play, Thurrock Council would need to present a robust case to neighbouring authorities explaining why it was unable to meet its identified need. We understand from Chelmsford City Council that no such case has been presented, let alone agreed. Chelmsford has allocated sufficient sites to meet its own identified need (and will continue to do so) but has no obligation to provide plots on behalf of other authorities. Indeed, para 8.21 of the Chelmsford Local Plan states that the sites in the Green Wedge would not be considered appropriate, even in the context of meeting its own need.

Therefore, the suggested link between a shortfall in Thurrock and this particular application in Chelmsford does not exist - except in the very general sense that any resident of Thurrock may for their own reasons wish to relocate to another council area (which is not the same thing as a planning obligation).

9. Conclusion

As set out above, the Parish Council cannot see any compelling planning reasons for allowing the proposed development to go ahead, particularly given its proposed location well within the Green Wedge, nor any proposed mitigation of its likely main effects. The Council therefore requests that the application is refused.

October 2023.