

## Broomfield Neighbourhood Plan Referendum

### Summary of Representations, Regulation 16 Consultation

The following table provides a brief summary of representations received to the Regulation 16 Consultation which ran from 8 May to 19 June 2024. The full comments were sent with the Submission documents to the Independent Examiner.

You can view the full comments on our Consultation portal:

<https://consult.chelmsford.gov.uk/kse/>

Consultee name	Summary of Comment
<b>Organisations</b>	
Essex Bridleways Association	Essex Bridleways Association is disappointed about the lack of awareness and significance attributed to horse riders as a user group. There is emphasis on cyclists, however new bridleways would provide routes for all user groups i.e. pedestrians, cyclists and horse riders and hence would be a far more equitable approach.
Essex County Council	<p>Comments received reflects ECC's role as the Minerals and Waste Planning Authority, the Highway Authority, the transportation Authority, the lead authority for education (including early years and childcare), the Lead Local Flood Authority and our responsibility for providing and delivering adult social care (ASC) and public health services. Comments also reflect ECCs lead role covering climate change and net zero carbon and green and blue infrastructure.</p> <p>Chapter 1 Vision and Objectives</p> <ul style="list-style-type: none"><li>• Housing Objectives – An amendment to bullet 2 is recommended to ensure housing and communities are accessible and inclusive</li><li>• Natural Environment Objectives – There should be more emphasis on the multifunctionality of green and blue infrastructure consistent with the Essex Green Infrastructure Strategy. There should be reference to the Essex Green Infrastructure Standards Technical Guidance. Objectives 1 and 3 should be expanded to ensure biodiversity net gain in new development and to ensure spaces are multifunctional. Similar changes are sought under the Development Design Objectives section</li><li>• Historic Environment Objectives - Bullet 1 to be amended to make reference to the contribution made by the setting of heritage assets</li><li>• Traffic and Travel Objectives – Change sought to bullet 1 to ensure the right terminology is used i.e. cycle routes and footways (this applies throughout the NP)</li></ul> <p>Chapter 2 Introduction to the Neighbourhood Plan (NP)</p> <ul style="list-style-type: none"><li>• References to 'main' policies in the Local Plan to be changed to Strategic policies in para 2.4. References should be made to the Local Development Plan in para 2.5.</li></ul> <p>Chapter 4 – Planning Policy Context</p>

- Amendments sought to ensure the timetable for the Chelmsford Local Plan Review reflects Local Plan consultation in May-June 2024. The Plan must also be in general conformity with the Local Plan rather than 'had regard'.

#### Chapter 6 – Natural Environment

- Community Action CA3 – Creation and Maintenance of Woodland and Hedgerows – Planting of hedgerows on both sides of new cycle routes is not supported because of perceived safety and security issues with routes enclosed by vegetation, and because of difficulty with maintenance of the hedgerows overgrowing the cycle routes, this relates to para 11.16 too. Any hedgerows planted need to conform with Local Transport Note (LTN) 1/20
- Policy BFD6 – Broomfield Green Wedge – The principle of multifunctional greenways is supported. Any design to be consisted with LTN 1/20
- Community Action CA4 – Further Study of the Natural Environment – reference is made to the Essex Local Nature Partnership (LNP) which has a statutory requirement to map areas of importance for biodiversity
- Community Action CA6 – Improving Public Access to the Chelmer River Valley – Further clarification is sought as to whether footpaths refer to footways or Public Rights of Way east end of Saxon Way (this applies to Policy BFD10 below as well)

#### Chapter 7 – Housing

- Policy BFD10 – Land East of Saxon Way – This site should be subject to the pre-application highway process. It needs a full Transport Assessment and consultation with ECC and Essex highways regarding new cycle routes/footways
- Policy BFD9 – Adaptable Homes – Paragraph two is welcomed subject to some amendments consistent with the ECC policy position and technology improvements

#### Chapter 8 – Development Design

- Policy BDF11 – All developments should have regard to the Parking Standards Design and Good Practice, currently being revised

#### Chapter 10 – Community Services and Facilities

- BFD14 – Land South of Broomfield Place – Paragraph 10.10-10.19 reflects ECC's position. Criterion (i) is supported re. new walking/cycling routes but these would be subject to detailed consideration at pre-application and application state

#### Chapter 11 – Traffic and Travel

- Para 11.2 - The reference to the ECC/Mouchel study (2007) should be deleted and replaced with reference to the Chelmsford's Future Transport Network (CFTN) forming part of the adopted Chelmsford Local Plan
- Reference to be made in the NP that, consistent with the CFTN, future proposals and strategies will be targeted to reduce traffic along Broomfield Road and encourage sustainable transport use Travel Strategy - Cycling

	<ul style="list-style-type: none"> <li>• ECC support the aspirations in the Plan to encourage cycling and walking through the Travel Strategy</li> <li>• Para 11.12 refers to an off-road cycle path from Goulton Road to Broomfield Hospital. The section linking with the City Centre is unfunded but the developers are obligated to complete section 1 of the cycle route from Goulton Road to Corporation Road junction with Broomfield Road</li> <li>• Potential improvements linking the Parish with Chelmsford Garden Community outlined as well as details of ECC's Local Cycling and Walking Infrastructure Plans which will be used to inform funding bids and subsequent delivery</li> <li>• The ambition in paragraph 11.13 to achieve safe north/south routes to enable safe cycling from any part of Broomfield to the City Centre and train station is noted. Further details provided about some existing and proposed cycle routes/paths in the area or where there is lack of facilities and where new development is required to provide new or contribution to new facilities</li> </ul> <p><u>Travel Strategy – Walking</u></p> <ul style="list-style-type: none"> <li>• Para 11.22 makes reference to there being no zebra or pelican crossing near Chelmer Valley High School. The parish council needs to provide evidence that there is current demand for a crossing at this location</li> </ul> <p><u>Travel Strategy - Encouraging Bus Use</u></p> <ul style="list-style-type: none"> <li>• Para 11.27 to be amended to reflect the current pricing of £2 for a single fare across Essex until the end of 2024</li> <li>• Para 11.29 to be amended to better reflect the Smarter Choices Campaign which covers the whole parish of Broomfield and Blasford Hill</li> <li>• Para 11.33 to be updated as the Radial Distributor Road is now completed and operational</li> <li>• Map 13 proposes several Toucan crossings – These can only be implemented where there are cycle routes either side</li> </ul> <ul style="list-style-type: none"> <li>• Community Action CA14 - Strategy to Encourage Sustainable Travel - The aspirations in CA14 are supported in principle as this approach is consistent with the CFTN Strategy</li> <li>• Community Action CA15 - Reducing the Impact of Traffic - the third paragraph to be deleted as the Broomfield Hospital has not been able to find an agreeable way forward to enable the link road and the developer has now revised the connected applications</li> </ul> <p><u>Broomfield Neighbourhood Plan Design Guidelines (April 2020)</u>  The 'Design Guidelines' were published in April 2020 and do not appear to have been updated alongside the Regulation 16 Plan or take into account any subsequent changes in national and local policy guidance, including the adopted Chelmsford Local Plan and the NPPF. Changes are not suggested but the Design Guidance should be reviewed and revised accordingly. Some observations are provided regarding more up to date evidence and policy.</p>
Essex Muslim Centre	New developments in Chelmsford will attract more people with different cultural, ethnic and religious backgrounds. Muslims are the second largest religious group in Chelmsford. Most services are concentrated in

	<p>the city centre, but there is a need for more facilities in the North of Chelmsford to help ease the load of the two existing mosques. Apart from areas for prayer there needs to be areas for educational, physical, social, and cultural activities together with ample parking and surrounding green space.</p>
Swifts Local Network: Swifts & Planning Group	<p>The Natural Environment section is welcome, but it does not consider endangered urban wildlife such as red-listed bird species which inhabit buildings, nor propose biodiversity enhancement integrated into the buildings of new development, e.g. swift bricks, bat boxes and hedgehog highways. Such special features are excluded from the DEFRA Biodiversity Net Gain Metric. Specific wording proposed.</p>
Chelmsford City Council	<p>Para 2.14 - The NPPF has been further updated, therefore suggest updating NPPF date to December 2023          Para 3.15 – New wording proposed to account for the creation of the Chelmsford Garden Community and how that impacts on the population of Broomfield Parish          Para 4.4 – Text to be updated to reflect a change in the Local Plan timetable          Policy BFD8 – Housing Mix – The policy and paragraphs 7.14-15 to be amended or deleted as it conflicts with Local Plan policies which are evidence base led          Policy BFD10 – Land East of Saxon Way – Policy to be expanded e.g. to specify site infrastructure requirements, vehicular and pedestrian access from Saxon Way, items the site should enable/provide. Wording provided.</p>
National Highways	<p>Para 1.4 - Vision Statement – Principles supported          Para 11.4 - Traffic and travel – Principles supported, happy to get involved with the Chelmsford's Future Transport Study Corridor          Para 7.4 – Housing – National Highways are aware of the North of Broomfield Strategic Growth Site</p>
Broomfield Parish Council	<p>The Council wholeheartedly supports the NP. The NP process has been a long, thorough and comprehensive process, involving local residents and stakeholders, so councillors are confident that it represents the settled will of the local community. The evidence base is also comprehensive and rigorous and has underpinned the entire process of developing the NP.</p>
Roka Nixy Ltd	<p>Expresses support for the plan on behalf of the owner of Roselawn Farm and surrounding land (Policy BFD10. Important View No 12 should be removed from Map 6 as it can only be seen from private viewpoints. Some further comments made in relation to the sensitive redevelopment of Roselawn Farm, opportunities for linked footpaths, cycleways and wider landscape and biodiversity benefits in line with Community Action CA6 and improvements to the rough track referred to in para 6.35.</p>
Obsidian Strategic Asset Management Ltd	<p>The Vision is welcomed, particularly the commitment to ensure that there is an adequate supply of housing to meet the needs of the Parish. Comments submitted in support of a site, Land East of Broomfield, which has also been submitted to the City Council's Call for Sites and the two recent Local Plan consultations. The submission sets out how the proposal meets Policies BFD2 and BFD6. Policy BFD8 must recognise that housing needs change over time and a desired mix in 2024 will very unlikely reflect the needs in subsequent years. The policy should make it absolutely clear that private mix must be dictated by the market. There is a conflict between this policy and the LP. It is not clear, therefore, why the Land East of Saxon Way (BFD10) has been carried forward for allocation within the NP, contrary to the findings of the</p>

	Neighbourhood Plan Site Options Assessment, when there are other more suitable sites in Broomfield.
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<b>Members of the public</b>	
Mr K W Fong	Expresses strong opposition to the proposed plan to convert Roselawn Farm into an urban area (Policy BFD10), as it should be preserved as Green Wedge, enhanced with cycle tracks. The farm could become a significant park offering recreational activities, and educational opportunities due to its historical significance.
Ms S W Chan	Disagrees with the proposals to convert Roselawn Farm into an urban area (Policy BFD10). This would worsen traffic congestion. Saxon Way is unmade is unsafe and unsuitable for more vehicles. There would be a loss of green space and opportunities for climate change mitigation. The area could offer recreational facilities and educational opportunities due to its historical significance.
Mr Dave Vicary	The NP does not mention the vehicles that will be generated by the new housing and GP surgery at Land East of Saxon Way (Policy BFD10), nor does it show vehicular access. Disagrees with some of the proposed cycle paths (Community Action CA14) such as a potential cycle path between Broomfield Hospital and Park and Ride and a route east of the B1008. Both of these are outside the area covered by the NP, in the rural area where the lighting will have an adverse impact on wildlife and there will be safety issues due to lack of surveillance.
Mr. Abu Reaz Alam	A new Muslim prayer/community facility is needed in the northern part of Chelmsford so people don't have to travel to the City Centre or Great Baddow and avoiding traffic congestion.
Mr Mohammad Muqtadir Samy	There is no provision for prayer hall which shows the plan completely ignored the religious and social gathering need of the local community despite the significantly increasing Asian community in Chelmsford of which majority are Muslims.
Mr Chanchal Khan	Despite weekly prayers arranged by Essex Muslim Centre at Springfield Parish Council, facilities are at full capacity making it difficult to accommodate everyone when parking. A new space will allow members to focus on mental health, social care and physical activity in order to contribute further to the local community
Mr Md Taifur Ripon	Parking at the existing facility is always full, a place in the new development would help to reduce pressure on central Chelmsford
Mr Moududur Rahman	There is insufficient worship facility in North Chelmsford due to the massive development and influx of people specially Asian and Muslim community which is also affecting traffic.
Mr Hasan Chowdhury, Mr Jahir Uddin	A number of facilities are needed to meet the needs of the growing Muslim community in North Chelmsford. This include a designated place / facilities to provide prayers & educational facilities, physical, social and cultural activities to support mental health, social care and NHS services.
Mr Mohammad Hasan Murad	Religious facilities are needed for the Muslim population in North Chelmsford. This should also have facilities for physical and mental health and for the elderly.
Mohammad Rahman	The influx of more people is having a clear effect on existing facilities like mosques, faith centre, school and other community services. We

	need more facilities in north Chelmsford so that the increased population living here will benefit from it in years to come.
Mohammad Islam	The proposed development in north Chelmsford is a significant step towards creating a more inclusive, supportive, and vibrant community. By addressing the specific needs of the Muslim community, this initiative will contribute to the overall well-being and cohesion of our town.
Mohammad Tanvir Ahmad	A couple of new schools, a community and sports centre and a religious facility is needed to meet the needs of the expanding community, as well as better public transport links to the train station to facilitate commuting.
Mr Bibi Afrose	A new sustainable community to accommodate the religious needs of the Muslim population, especially in the northern part of Chelmsford away from busy roads and junctions is needed. It is essential to plan and design future infrastructure and developments with these needs in mind.
Abu Akanda	A mosque and Muslim community centre is needed.