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Dear Mr Ashcroft,

**Independent Examination of the Broomfield Neighbourhood Development Plan**

Thank you for your Examiner's Clarification Note relating to the Broomfield Neighbourhood Plan Examination.

Broomfield Parish Council has provided responses to the Points for Clarification, which are attached as an Annex to this letter.

If either the City Council or Parish Council can provide further information, please let me know.

Yours sincerely,

*Jenny Robinson*

Jenny Robinson  
Senior Planning Officer

# **Broomfield Neighbourhood Plan**

## **Parish Council response to Examiner's Clarification Note**

**August 2024**

The Neighbourhood Plan Examiner published a Clarification Note on 18 July 2024. This paper provides the Parish Council's response to the questions raised in the Note.

### **Policy BFD 3 - Recreational Disturbance Avoidance and Mitigation**

The Examiner asks whether it is necessary for the policy to be included in the Plan given the status of the Essex Coast Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document which is already administered by the City Council through the development management process?

#### ***Parish Council response:***

The relevant adopted Local Plan policy on this matter is Policy DM16 – Ecology and Biodiversity. The policy was written and adopted before the Essex Recreational disturbance Avoidance and Mitigation Strategy (RAMS) and associated Supplementary Planning Document (SPD) was adopted by the City Council. The policy was included in the Neighbourhood Plan to bring the Local Plan policy up-to-date and providing a policy “hook” under which the SPD could operate in the Neighbourhood Area.

### **Policy BFD 8 – Housing Mix**

The Examiner asks whether the figures set out in Policy BFD 8 could they be rounded up so that they are less mathematical in their format?

#### ***Parish Council response:***

The Parish Council acknowledges that it will not be possible to deliver the precise mathematical split of housing on a development as the division would result in a fraction of a number. For this reason, the Examiner might like to consider taking the approach that he has in other neighbourhood plan examinations by adding the word “approximately” before each percentage.

### **Policy BFD 9 – Adaptable Homes**

The Examiner asks whether the second part of the policy is required as the provision of broadband to new buildings is now addressed nationally in the Building Regulations?

#### ***Parish Council response:***

The Parish Council accepts that these matters are now required through the implementation of the Building Regulations and is not required in the policy.

### **Policy BFD 10 – Land east of Saxon Way**

The Examiner raises a number of questions in relation to this policy which are addressed separately below.

**Parish Council response:**

1 – Commercial viability: The Parish Council has worked with the landowner during the preparation of the Plan. The landowner has confirmed his position by providing the following email response: – ‘Dear Sir, As a Broomfield family for many generations, and as landowners in the parish we are supportive of the concept being proposed for our land at Champion Farm as set out in the Neighbourhood Plan. We are committed to negotiate with the Broomfield Parish Council to try and achieve a successful outcome for our land.’ (copy of email dated 29<sup>th</sup> August attached below as Appendix 1).

Given its location outside the Settlement Boundary, land values will not be those expected of a market housing site, such as the strategic site at North Broomfield or any other site within the Settlement Boundary. As such, there is no reason to think that the proposed package of uses are not viable. They are not ‘for profit’ uses and therefore commercial viability is not considered to be a relevant constraint in this instance.

2 – Active Community Land Trust (CLT): The Council has worked with the Rural Community Council for Essex to develop the approach set out in the Plan, including the use of a CLT or similar to deliver the community housing element. The RCCE has conducted an affordable housing needs survey on behalf of the Council, which indicated a need for affordable community housing. As a new initiative in Broomfield, there is not an established CLT in the Parish at the moment. The Council considers that the best time to establish the CLT and recruit members is upon confirmation of the allocation when the Plan is adopted, because this will create an immediate purpose and heightened rationale for the CLT. Initially, its focus would therefore be on delivering the proposal in BFD10.

3 - Delivery of a GP surgery on the site: The local Integrated Care Board (ICB) has acknowledged that there is a significant shortfall in surgery provision in the North of Chelmsford; and that it has no clear way of addressing this by any other means. A programme of meetings is underway between the ICB and local representatives, led by the Patient Partnership Group at Little Waltham Surgery (the primary care network that is most affected by the shortfall). It is envisaged that a new surgery would operate as another site of this existing GP practice. A planning workshop session is due in September. The Parish Council is part of this process and, due to residents’ longstanding desire for a surgery, would prioritise this use within the 1.25 ha developable area of the site allocation. However, should the current ICB process lead to a different outcome, the Council’s intention would be to use the developable area entirely for community-led affordable housing.

4 - Impact of the proposed development on the amenity of the existing residential properties in Saxon Way: The Council expects that the development proposed in policy BFD10 would require the upgrading of Saxon Way (which is currently unmade) to meet County Highways minimum standards, in order to mitigate impact and improve the amenity of existing residents regarding road safety and pollution. In terms of a detailed impact assessment, there is no detailed scheme at present against which impact could be assessed. However, Policy BFD10, along with the other relevant policies of the Neighbourhood Plan and the Local Plan, are sufficient to ensure that the residential amenity of residents would be safeguarded - in particular, Policy DM29 (Protecting Living and Working Environment) with which a future planning application would need to conform.

**Policy BFD 17 – Micro Hydroelectricity Schemes**

The Examiner seeks clarity as to whether the policy relates to the various proposals listed in paragraph 12.18 of the Plan or whether hydroelectricity is defined elsewhere in the Plan.

**Parish Council response:**

The Neighbourhood Plan does not define hydroelectricity. The [British Hydropower Association](#) defines it as “Mini hydro power systems convert the potential energy in small streams and waterways into kinetic energy via a mechanical turbine, which drives a generator to produce electricity.”

## Representations

As requested by the Examiner, the Parish Council provides a table below with responses to the comments received, addressing in particular the points raised by:

- Essex County Council;
- Roka Nixy (via IBA Planning); and
- Obsidian Strategic Asset Management Limited
- Chelmsford City Council

Summary Comment	Parish Council response
<p><b>Essex County Council</b> Essex County Council submitted comments at the Regulation 14 stage.</p>	
<p><b>Objectives</b> The County Council has put forward a number of suggested changes to the NP Objectives, repeating what was suggested at the Regulation 14 stage.</p> <p><b>Chapters 2 and 4</b> The County Council suggest some minor changes and updating of Local Plan timetable.</p> <p><b>Community Action CA3</b> The County Council suggest references to `cycle paths` should be amended to `cycle routes`</p> <p>The County Council also states that they would not advocate planting of hedgerows on both sides of new cycle routes 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. Reference is made to Department for Transport Local Transport Note (LTN) 1/20 Cycle Infrastructure Design.</p> <p><b>Policy BFD6 – Broomfield Green Wedge</b> The County Council suggests amending the policy to refer to cycle routes rather than paths.</p>	<p>The Parish Council remains of the opinion that the suggested changes are too detailed for inclusion as an objective.</p> <p>The suggestions put forward by the County Council are not matters that impact on whether the Plan meets the Basic Conditions and the Plan can be amended to bring it up-to-date ahead of the Referendum.</p> <p>The County Council suggested this at Regulation 14 consultation stage. The Parish Council remains of the opinion that members of the public better understand the term `cycle paths` than `cycle routes`, so use of both terms is desirable.</p> <p>The County Council made this comment at Regulation 14 consultation stage. The Parish Council will take account of this when individual cycle routes are implemented, but remains of the opinion that this level of detail is not appropriate in the text of the Plan.</p> <p>The Parish Council considers that the current wording remains clear and appropriate.</p>

Summary Comment	Parish Council response
<p><b>Community Action CA4 - Further Study of the Natural Environment</b> The County Council provides comments but do not put forward and suggested changes.</p> <p><b>Community Action CA6 - Improving Public Access to the Chelmer River Valley</b> The County Council seeks clarification as to whether footpaths refer to footways or Public Rights of Way (PRoW).</p> <p><b>Policy BFD10 – Land East of Saxon Way</b> The County Council recommends that the site should be subject to the pre-application highway advice process which provides an early indication of whether a proposal is likely to be acceptable to the Highway Authority or not and details of information that should be submitted with any application.</p> <p>A further amendment is required to amend cycle paths to cycle routes and clarification is sought as to whether footpaths refer to footways or Public Rights of Way</p> <p><b>Policy BFD9 – Adaptable Homes</b> The County Council puts forward an amendment to paragraph 2 of the policy relating to the provision of broadband.</p> <p><b>Chapter 8 – Design Development [sic]</b> The County Council seeks an amendment to criterion v to refer only to cycle routes.</p>	<p>The Parish Council notes the comments.</p> <p>The reference to footpaths refers to neither footways or public rights of way. Footways are understood to be part of the highway and PRoWs are statutory paths that are legally designated. The Parish Council, as the Community Action states, seeks to get agreement with landowners to create new paths. Over time, these could potentially become PRoWs, if the landowner agrees.</p> <p>The comments are noted. The Council considers such a requirement would be addressed via the City Council at the pre-application stage.</p> <p>Again, the Parish Council considers that the current wording remains clear and appropriate.</p> <p>The Parish Council notes that the Examiner asks whether this element of the policy is required given the requirements of the Building Regulations. Should the Examiner consider it appropriate to retain this paragraph, the Parish Council is happy to leave the Examiner to determine whether the County Council’s suggestions are necessary to meet the Basic Conditions.</p> <p>The Parish Council believes the County Council is requesting amendment to Policy BFD11 – Development Design Considerations. Part v states “Cycling should be encouraged by introducing cycle routes (cycle paths) and providing bicycle parking and storage where appropriate.” The Parish Council considers that the criterion is clear and does not require further amendment.</p>

Summary Comment	Parish Council response
<p><b>Policy BFD14 - Land South of Broomfield Place</b> The County Council make comments but does not seek any changes to the Policy.</p>	<p>The County Council's comments are noted.</p>
<p><b>Chapter 11 – Traffic and Travel</b> The County Council recommend the reference to the ECC/Mouchel study (2007) is deleted from paragraph 11.2 and replaced with reference to the Chelmsford's Future Transport Network (CFTN).</p>	<p>The County Council, at Regulation 14 consultation stage, sought this amendment to paragraph 11.4, rather than paragraph 11.2, to refer to Chelmsford's Future Transport Network (CFTN). This was carried out in the Submission Plan. Further changes to paragraph 11.4 could be made in the Referendum Plan without impacting on whether the Plan meets the Basic Conditions.</p>
<p><b>Travel Strategy – Cycling</b> A number of comments are made but no changes to the Plan are sought</p>	<p>The Parish Council notes the comments.</p>
<p><b>Travel Strategy - Encouraging Walking</b> The County Council seeks evidence that there is current demand for a crossing near Chelmer Valley High School.</p>	<p>The B1088 Main Road is a heavily trafficked road and there are bus stops on the eastern side of the road near the access routes to the school. It is considered that a crossing in this area would help to encourage safe bus and walking trips to the school, which currently has in excess of 1200 pupils.</p>
<p><b>Travel Strategy - Encouraging Bus Use</b> The County Council seeks the amendment to paragraph 11.27 to reflect the current pricing of £2 per single fare across Essex until the end of 2024.</p>	<p>Given that the initiative is only confirmed to the end of 2024, it does not seem appropriate to include such a statement that could soon become out-of-date.</p>
<p><b>Paragraph 11.29</b> The County Council recommend paragraph 11.29 is amended to better reflect the 'Smarter Choices Campaign' being provided by the developers at North Broomfield.</p>	<p>The recommended changes to paragraph 11.29 could be made in the Referendum Plan without impacting on whether the Plan meets the Basic Conditions.</p>
<p><b>Paragraph 11.33</b> The County Council recommend paragraph 11.33 is updated to reflect that the Radial Distributor Road around Beaulieu Park has been completed and is operational.</p>	<p>The recommended changes to paragraph 11.33 could be made in the Referendum Plan without impacting on whether the Plan meets the Basic Conditions.</p>
<p><b>Community Action CA14 - Strategy to Encourage Sustainable Travel</b> The County Council recommend reference to 'cycle paths' is amended to 'cycle routes' and 'pavements' to</p>	<p>The same comment was made at Regulation 14 stage and the Parish</p>

Summary Comment	Parish Council response
<p>`footways' in paragraph 1.</p> <p><b>Community Action CA15 - Reducing the Impact of Traffic</b> The County Council seek the deletion of paragraph 3 of the Community Action.</p> <p><b>Broomfield Neighbourhood Plan Design Guidelines (April 2020)</b> The County Council seek a number of changes to the Design Guidelines to, primarily, bring them up-to-date</p>	<p>Council amended the Community Action to refer to footways (pavements) and cycle routes (cycle paths). It is considered that this approach helps the layperson understand the Plan without the use of jargon.</p> <p>The recommended change to delete paragraph 3 could be made in the Referendum Plan without impacting on whether the Plan meets the Basic Conditions.</p> <p>Like evidence documents that support all development plan documents, they can become out-of-date very quickly. However, it is not considered necessary to commission revisions to the Guidelines at this stage.</p>
<p><b>Mr. Abu Reaz Alam</b></p>	
<p>Mr. Abu Reaz Alam did not comment at Regulation 14 consultation stage</p>	
<p>Mr. Abu Reaz Alam seeks the provision of community spaces that will fulfil both a religious and community facility in the north of Chelmsford.</p>	<p>The Neighbourhood Plan would need to demonstrate that any land allocated for such uses would be available and deliverable during the Neighbourhood Plan period. The Parish Council has not previously been made aware of the need for such facilities and it is suggested that the Local Plan is best positioned to enable such development.</p>
<p><b>Mr Mohammad Muqtadir Samy</b></p>	
<p>Mr Mohammad Muqtadir Samy did not comment at Regulation 14 consultation stage</p>	
<p>Mr Mohammad Muqtadir Samy objects to the lack of provision for prayer hall which shows the plan completely ignored the religious and social gathering need of the local community</p>	<p>The Neighbourhood Plan would need to demonstrate that any land allocated for such uses would be available and deliverable during the Neighbourhood Plan period. The Parish Council has not previously been made aware of the need for such facilities and it is suggested that the Local Plan is best positioned to enable such development.</p>
<p><b>Mr K W Fong</b></p>	
<p>Mr K W Fong did not comment at Regulation 14 consultation stage</p>	
<p>Mr Fong objects to Policy BFD10 – Land east of Saxon Way in terms of:</p>	

Summary Comment	Parish Council response
<p><u>Community Health and Wellbeing</u> Mr Fong suggests that Roselawn Farm should be enhanced with cycling tracks, as suggested in the Neighbourhood Plan. This would promote active travel, provide a safe space for cyclists. The farm could become a significant park offering recreational activities like walking and cycling, fostering physical and mental well-being.</p> <p><u>Historical and Educational Value</u> Mr Fong suggests that development risks irreversibly damaging the important archaeological sites. Transforming it into an urban zone would mean losing a significant part of our cultural heritage that holds historical and sentimental value for many residents.</p> <p><u>Smart Urban Planning and Quality of Life</u> Mr Fong states that Chelmsford has other opportunities for urban development that do not compromise green wedges. The city's adopted local plan includes sizable developments in other parts of Chelmsford, which are more economically effective and sustainable.</p> <p><u>Traffic and Infrastructure Concerns</u> Mr Fong states that the B1088 is at 96% capacity (nearly at full capacity), and further development would worsen traffic, making it difficult for emergency vehicles to navigate. Urbanizing Roselawn Farm will only exacerbate the problem.</p> <p><u>Road Safety and Pollution</u> Mr Fong states that Saxon Way has a rough surface and lack of safety measures make it unsuitable for increased traffic. Saxon Way is partly owned by the Council which should take</p>	<p>Policy BFD10 aims to secure exactly the type of facilities that Mr Fong supports (see para.s 6.28 to 6.34). Open space, including cycle paths, constitutes the far the largest part of the proposed site allocation (4 out of 5.3 ha). However, as recognised in para.s 6.36 and 6.37, these benefits are unlikely to be realised without a small amount of development.</p> <p>Celebrating local heritage is a key reason for the overall proposal, as explained in para.s 6.33, 7.33, 9.8-9 and in Community Action CA10. The site would not be transformed into an urban zone and an extensive pre-application stage of archaeological work, including geophysics and trial-trenching, would be required (para. 7.33) to identify and protect any remaining archaeology.</p> <p>In terms of smart planning and quality of life, opportunities for development in the wider Chelmsford area do not achieve any of the benefits of this particular scheme for Broomfield. The reasons for selecting this site over others promoted in Broomfield are set out at para.s 7.26 and 7.27</p> <p>Addressing the need for new foot and cycle paths, as part of the wider strategy to promote sustainable travel in Community Action CA14, is a key reason for the overall proposal (see para.s 7.26 and 7.32). Due to the small size of the proposed developable area, the impact on the highway network is unlikely to represent a significant issue. The County Highways Department does require developers to seek pre-planning application advice but has not objected outright to the proposal.</p> <p>In terms of road safety and pollution, it would be expected that Saxon Way would be made up to meet County Highways minimum standards.</p>



Summary Comment	Parish Council response
responsibility to pave the road to reduce the air and noise pollution immediately.	
<b>Ms. S W Chan</b>	
Ms. S W Chan did not comment at Regulation 14 consultation stage	
<p>Ms. Chan objects to Policy BFD10 – Land east of Saxon Way in terms of:</p> <p><u>Main Road General Traffic Issues:</u> Ms Chan states that the B1088 is at 96% capacity (nearly at full capacity), and further development would worsen traffic, making it difficult for emergency vehicles to navigate. Urbanizing Roselawn Farm will worsen the traffic congestion.</p> <p><u>Road condition of Saxon Way:</u> Ms Chan states that Saxon Way is an unmade road and is unsafe and unsuitable for more vehicles.</p> <p><u>Urban Planning and Quality of Life:</u> Ms Chan states that Chelmsford has other opportunities for urban development that do not compromise green wedges. The city’s adopted local plan includes sizable developments in other parts of Chelmsford, which are more economically effective and sustainable.</p> <p><u>Community Health and Well-being:</u> Ms Chan suggests that Roselawn Farm is an ideal place offering spaces for a sizable recreational activities like hiking, cycling, and picnicking, promoting physical activity and mental wellbeing and that currently there is not such green facilities available nearby. Urbanizing this space would deprive residents of these invaluable health and wellness benefits.</p>	<p>Addressing the need for new foot and cycle paths, as part of the wider strategy to promote sustainable travel in Community Action CA14, is a key reason for the overall proposal (see para.s 7.26 and 7.32). Due to the small size of the proposed developable area, the impact on the highway network is unlikely to represent a significant issue. The County Highways Department does require developers to seek pre-planning application advice but has not objected outright to the proposal.</p> <p>In terms of road safety and pollution, it would be expected that Saxon Way would be made up to meet County Highways minimum standards.</p> <p>Opportunities for development in the wider Chelmsford area would not achieve any of the benefits of this particular scheme for Broomfield. The reasons for selecting this site over others promoted in Broomfield are set out at para.s 7.26 and 7.27. Para 7.28 explains that the proposal does not materially harm the role, function and intrinsic character and beauty of the Green Wedge’.</p> <p>There is no public access to area at present, so it currently offers no benefit for the activities mentioned. Policy BFD10 aims to secure exactly the type of facilities that Ms Chan supports (see para.s 6.28 to 6.34). Open space, including cycle paths, constitutes the far the largest part of the proposed site allocation (4 out of 5.3 ha). However, as recognised in para.s 6.36 and 6.37, these benefits are unlikely to be realised without a small amount of development.</p>

Summary Comment	Parish Council response
<p><u>Historical and Educational Value:</u> Ms Chan states that further development will put a risk in damaging the burial site that is irreversible once it is damaged. Transforming it into an urban zone would mean losing a significant part of our cultural landscape that has historical and sentimental value to many residents.</p> <p><u>Environmental Sustainability:</u> Ms Chan states that converting the Green Wedge into urban land would result in significant environmental degradation, loss of wildlife habitat, and decreased air quality.</p> <p><u>Climate Change Mitigation:</u> Ms Chan states that urban development on this farm would contribute to increased carbon emissions and further exacerbate climate-related challenges. Green wedges also help in managing water resources, reducing runoff, and maintaining groundwater levels.</p>	<p>Celebrating local heritage is a key reason for the overall proposal, as explained in para.s 6.33, 7.33, 9.8-9 and in Community Action CA10. The site would not be transformed into an urban zone and an extensive pre-application stage of archaeological work, including geophysics and trial-trenching, would be required (para. 7.33) to identify and protect any remaining archaeology.</p> <p>In terms of environmental sustainability and climate change mitigation, the issues raised are fully addressed in the Strategic Environmental Assessment (SEA) for the Broomfield Neighbourhood Plan (AECOM July 2024), which is available on the City Council's website, specifically, para.s 7.1 to 7.5. In addition, any development would have to achieve a minimum 10% net gain in biodiversity.</p>
<p><b>Dr Mohammad Kabir</b></p>	
<p>Dr Mohammad Kabir did not comment at Regulation 14 consultation stage</p>	
<p>Dr Kabir states that there is a need to build sustainable community and religious facilities for religious, Muslim population, specially in North of Chelmsford.</p>	<p>The Neighbourhood Plan would need to demonstrate that any land allocated for such uses would be available and deliverable during the Neighbourhood Plan period. The Parish Council has not previously been made aware of the need for such facilities and it is suggested that the Local Plan is best positioned to enable such development.</p>
<p><b>Mr Chanchal Khan</b></p>	
<p>Mr Chanchal Khan did not comment at Regulation 14 consultation stage</p>	
<p>Mr Kham states that despite weekly prayers arranged by Essex Muslim Centre at Springfield Parish Council, facilities are at full capacity which means that it is difficult to accommodate everyone when parking. Having 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</p>	<p>The Neighbourhood Plan would need to demonstrate that any land allocated for such uses would be available and deliverable during the Neighbourhood Plan period. The Parish Council has not previously been made aware of the need for such facilities and it is suggested that the Local Plan is best positioned to enable such development.</p>

Summary Comment	Parish Council response
<p><b>Mr Md Taifur Ripon</b> Mr Md Taifur Ripon did not comment at Regulation 14 consultation stage</p>	
<p>Mr Taifur Ripon states that when we go for Eid or Ramadan or Friday prayer , we care fully parking in parking spot , but always oversubscribed . A place in new development would help to reduce pressure on central Chelmsford .</p>	<p>The Neighbourhood Plan would need to demonstrate that any land allocated for such uses would be available and deliverable during the Neighbourhood Plan period. The Parish Council has not previously been made aware of the need for such facilities and it is suggested that the Local Plan is best positioned to enable such development.</p>
<p><b>Mr Mohammad Bari</b> Mr Mohammad Bari did not comment at Regulation 14 consultation stage</p>	
<p>Mr Bari states that a larger centre in the North is needed to provide for daily prayers, Friday prayers, Eid celebrations, and Ramadan prayers. This centre should also offer fitness classes, mental health support, and activities for the elderly to help Muslims engage with the community. Educating young people about religious values and respect for other religions is crucial to preventing extremism. A designated area for prayer, education, physical activities, and social support is essential for the community's well-being and integration with local services..</p>	<p>The Neighbourhood Plan would need to demonstrate that any land allocated for such uses would be available and deliverable during the Neighbourhood Plan period. The Parish Council has not previously been made aware of the need for such facilities and it is suggested that the Local Plan is best positioned to enable such development.</p>
<p><b>Mr Hasan Chowdhury</b> Mr Hasan Chowdhury did not comment at Regulation 14 consultation stage</p>	
<p>Mr Chowdhury identifies a number of issues that the Muslim community faces in Chelmsford and states that the Muslim community in North Springfield need a designated place /facilities to provide prayers &amp; educational facilities, physical, social and cultural activities to support mental health, social care and NHS services.</p>	<p>The Neighbourhood Plan would need to demonstrate that any land allocated for such uses would be available and deliverable during the Neighbourhood Plan period. The Parish Council has not previously been made aware of the need for such facilities and it is suggested that the Local Plan is best positioned to enable such development.</p>
<p><b>Dr Hossain Hadi</b> Dr Hossain Hadi did not comment at Regulation 14 consultation stage</p>	
<p>Dr Hadi states that the Essex Muslim Centre is eager to develop a community centre in North Chelmsford to provide a space for Muslims to observe religious duties such as Friday prayers, Eid prayers, and nightly prayers during Ramadan. They propose the establishment of a centre that can accommodate 300-400 people for these congregational activities and facilities for religious education, social activities, mental health support, women's exercise clubs, and physical activities, promoting health awareness and targeting ethnic and gender-specific needs. They hope the</p>	<p>The Neighbourhood Plan would need to demonstrate that any land allocated for such uses would be available and deliverable during the Neighbourhood Plan period. The Parish Council has not previously been made aware of the need for such facilities and it is suggested that the Local Plan is best positioned to enable such development.</p>

Summary Comment	Parish Council response
review plan will address these needs, particularly in North Chelmsford, an area with growing numbers of Muslim population	
<b>Mr Md Moududur Rahman</b> Mr Moududur Rahman did not comment at Regulation 14 consultation stage	
Mr Rahman expresses concern about the insufficient worship facility with in the North Chelmsford area	The Neighbourhood Plan would need to demonstrate that any land allocated for such uses would be available and deliverable during the Neighbourhood Plan period. The Parish Council has not previously been made aware of the need for such facilities and it is suggested that the Local Plan is best positioned to enable such development.
<b>Mr Jahir Uddin</b> Mr Jahir Uddin did not comment at Regulation 14 consultation stage	
Mr Uddin identifies a number of issues concerning facilities for the Musim community in Chelmsford and states that there is an urgent need a designated area for Muslims that provides prayer facilities, educational opportunities, physical activities, and social and cultural activities to support mental health, social care, and NHS services	The Neighbourhood Plan would need to demonstrate that any land allocated for such uses would be available and deliverable during the Neighbourhood Plan period. The Parish Council has not previously been made aware of the need for such facilities and it is suggested that the Local Plan is best positioned to enable such development.
<b>Mr Mohammad Hasan Murad</b> Mr Mohammad Hasan Murad did not comment at Regulation 14 consultation stage	
Mr Murad identifies a number of issues concerning facilities for the Musim community in Chelmsford urges the planning authority to take this into consideration hence the need to build sustainable , bigger community and religious facilities for religious Muslims population, especially in North of Chelmsford .	The Neighbourhood Plan would need to demonstrate that any land allocated for such uses would be available and deliverable during the Neighbourhood Plan period. The Parish Council has not previously been made aware of the need for such facilities and it is suggested that the Local Plan is best positioned to enable such development.
<b>Mr Mohammed Rahman</b> Mr Mohammed Rahman did not comment at Regulation 14 consultation stage	
Mr Rahman identifies a number of issues concerning facilities for the Musim community in Chelmsford and states that there is a need more facilities in north Chelmsford so that the increased population living here will benefit from it in years to come.	The Neighbourhood Plan would need to demonstrate that any land allocated for such uses would be available and deliverable during the Neighbourhood Plan period. The Parish Council has not previously been made aware of the need for such facilities and it is suggested that

Summary Comment	Parish Council response
	the Local Plan is best positioned to enable such development.
<b>Mohammad Islam</b> Mohammad Islam did not comment at Regulation 14 consultation stage	
Mr Rahman identifies a number of issues concerning facilities for the Musim community in Chelmsford.	The Neighbourhood Plan would need to demonstrate that any land allocated for such uses would be available and deliverable during the Neighbourhood Plan period. The Parish Council has not previously been made aware of the need for such facilities and it is suggested that the Local Plan is best positioned to enable such development.
<b>Mr Mohammad Tanvir Ahmad</b> Mr Tanvir Ahmad did not comment at Regulation 14 consultation stage	
Mr Tanvir Ahmad suggests that it is necessary to build a couple of new schools, a community and sports centre, and spaces for religious purposes to meet the needs of the expanding community in the north of the City. He seeks to have a Muslim prayer facility in the new build area and states that transportation from the new development to the train station needs to be more frequent.	It is believed that these comments are aimed at the Local Plan rather than the Neighbourhood Plan
<b>Mr Bibi Afrose</b> Mr Afrose did not comment at Regulation 14 consultation stage	
Mr Afrose identifies a number of issues concerning facilities for the Musim community in Chelmsford and states that there is a need more facilities in north Chelmsford.	The Neighbourhood Plan would need to demonstrate that any land allocated for such uses would be available and deliverable during the Neighbourhood Plan period. The Parish Council has not previously been made aware of the need for such facilities and it is suggested that the Local Plan is best positioned to enable such development.
<b>Mr Michael Priaulx, Local Network: Swifts &amp; Planning Group</b> The Local Network: Swifts & Planning Group did not comment at Regulation 14 consultation stage	
The Group welcome 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. Also requests that the following should be added to the Neighbourhood Plan “Existing nest sites for building-dependent species such as swifts and house martins should be protected, as these endangered red-listed species which are present but declining in the parish return annually to traditional nest sites. Mitigation should be provided if these nest sites cannot be protected”	It is considered that these matters are adequately addressed in the Chelmsford Local Plan and their <a href="#">“Making Places - Supplementary Planning Document” January 2021</a>

Summary Comment	Parish Council response
<p><b>Chelmsford City Council</b> The City Council commented at Regulation 14 consultation stage</p>	
<p><b>Factual updates</b> The City Council propose a number of amendments to paragraphs that would be factual updates.</p> <p><b>Policy BFD 8 – Housing Mix</b> The City Council request that the policy and paragraphs 7.14 and 7.15 are amended/deleted. They suggest that the housing mix should be that of Policy DM1 of the Local Plan. And that the policy conflicts with the Local Plan policy.</p> <p>The City Council state that the Local Plan Strategic Growth Site 8 – North of Broomfield – includes a requirement for homes of a mixed size and type, with qualification at Para 7.289 that housing should be provided in accordance with the Council’s policy requirements and that it cannot therefore be required to meet the criteria in Policy BFD8, and the two are in conflict.</p>	<p>Policy DM1 of the Local Plan is not a strategic policy and therefore the Neighbourhood Plan does not have to be in general conformity with it. The Broomfield Housing Needs Assessment is a detailed assessment based solely on the parish rather than the wider City Council administrative area. It is therefore entirely appropriate to include a locally derived policy for the mix of housing to meet locally identified needs.</p> <p>The Strategic Growth Site policy allocates the site for “Around 450 new homes of mixed size and type to include affordable housing.” Para 7.289 of the adopted Local Plan states “The development should provide a mix of size and types of homes. Affordable, self-build and custom-build, appropriately accessible and adaptable housing as well as other types of specialist housing should be provided in accordance with the Council’s policy requirements. The capacity of the site and mix of housing will need to reflect the available primary school places within the admissions area.”</p> <p>The Examiner will note that neither the policy nor supporting paragraph specify the housing mix except in relation to the available primary school places – which is not an appropriate means of defining housing need.</p> <p>Paragraph 7.290 of the adopted Local Plan notes that “There is an emerging Neighbourhood Plan being prepared in Broomfield which it is envisaged will help shape this site allocation.”</p> <p>The Parish Council is therefore of the opinion that there is nothing in a strategic policy in the Local Plan that restricts the Neighbourhood Plan specifying the</p>

Summary Comment	Parish Council response
<p>The City Council states that “There is no indication of how a development of 10 or more dwellings would be restricted to existing Broomfield residents (which would be unlikely particularly for the 65% of market homes) so an alternative mix would not therefore be meeting the needs of Broomfield parish.”</p> <p><b>Policy BFD10 – Land east of Saxon Way</b> The City Council advise that the policy includes all the required elements to ensure development is deliverable and sustainable.</p> <p>The City Council considers that the site size would be considered a major development which would require a need for various infrastructure contributions, which are suggested in the comment.</p> <p>The City Council suggest including “Main vehicle and pedestrian access would be from Saxon Way.”</p> <p>The City Council suggest that further clarification may be necessary relating to whether the housing and the surgery could come forward together, or whether they are alternatives. The policy does indicate that the housing would only come forward if the remainder of the site is for community open space; if so, the bullets for the uses could be re-ordered as follows:</p> <ul style="list-style-type: none"> <li>• community affordable housing to meet the specific needs of local people in Broomfield; or</li> <li>• a GP surgery should the Mid and South Essex Integrated Care Board provide evidence that the surgery is required and deliverable at the time a planning application for the development is submitted; and</li> <li>• community open space, cycle paths and footpaths.</li> </ul>	<p>housing mix for the strategic site and that Policy BFD 8 is in conformity with the strategic policies of the adopted Local Plan.</p> <p>The Parish Council does not understand this comment, as the Neighbourhood Plan does not propose that developments of 10 or more dwellings should be restricted to existing Broomfield residents (apart from the Community Land Trust project proposed by Policy BFD10).</p> <p>The Parish Council would be happy for the policy to be amended to include all the required elements if the Examiner considers it necessary to provide a clear and deliverable policy.</p> <p>The Parish Council would support the inclusion of contributions to infrastructure requirements, but on the proviso that it is caveated that the contributions would only be required if the quantum and type of development triggers such needs and is justified, given that CIL is already in place for such contributions. In particular, financial contributions should not be sought from a GP facility towards healthcare provision, given that the development makes such provision.</p> <p>The Parish Council would support such an amendment should the Examiner consider it necessary.</p> <p>The Parish Council considers that both the affordable housing and GP surgery could both be developed on the identified developable area. Whatever built development takes place, the public open space is a requirement of the development. As such, the suggestion put forward by the City Council is not appropriate. A better approach would be:</p> <ul style="list-style-type: none"> <li>• community affordable housing to meet the specific needs of local people in Broomfield; <b>and/or</b></li> <li>• a GP surgery should the Mid and South Essex Integrated Care Board provide evidence that the surgery is required and deliverable at the time a planning</li> </ul>

Summary Comment	Parish Council response
	application for the development is submitted; <b>and</b> <ul style="list-style-type: none"> <li>community open space, cycle paths and footpaths.</li> </ul>
<b>Abu Akanda</b>	
Abu Akanda did not comment at Regulation 14 consultation stage	
Abu Akanda states that a mosque & Muslim community centre	The Neighbourhood Plan would need to demonstrate that any land allocated for such uses would be available and deliverable during the Neighbourhood Plan period. The Parish Council has not previously been made aware of the need for such facilities and it is suggested that the Local Plan is best positioned to enable such development.
<b>National Highways</b>	
National Highways commented at Regulation 14 consultation stage	
National Highways support the Vision Statement  National Highways support the principles of the traffic and transport objectives.  National Highways state they are aware of the 'North of Broomfield' and Strategic Growth 8 proposal.	No further comment
<b>Broomfield Parish Council</b>	
The Parish Council's response is naturally supportive of the Neighbourhood Plan as submitted	No further comment
<b>IBA Planning on behalf of Roka Nixy Ltd</b>	
Neither IBA Planning or Roka Nixy Ltd commented at Regulation 14 consultation stage	
IBA Planning object to the inclusion of View 12 on Map 6 as it is not on publicly accessible land.	This view looking east from the end of Saxon Way (including the description and sensitivities outlined in the text) can be seen by the public from the footway on the northern side of Saxon Way; and at the access to the Royal British Legion Club which is open to public membership.
<b>Mr Dave Vicary</b>	
Mr Vicary commented at Regulation 14 consultation stage	
<b>Policy BFD 10 – Land east of Saxon Way</b> Mr Vicary states that there is no mention in the submitted Plan of catering for the extra vehicles generated by the development and how this would impact on surrounding roads and existing residential properties. He also states that	The County Highways Department seeks to understand the vehicle impact on the highway network resulting from the proposal but have not objected outright to



Summary Comment	Parish Council response
<p>the Concept Plan does not show how vehicular access would be obtained. Mr Vicary requests the deletion of the Policy from the Plan.</p> <p><b>Community Action CA 14 - Strategy to Encourage Sustainable Travel</b> Mr Vicary commented on this matter at the Regulation 14 consultation and makes comments in response to those of the Parish Council in the Consultation Statement.</p>	<p>the allocation. Impact on the highway network would be addressed at pre-application discussions and at the planning application stage. Due to the small size of the proposed developable area, the impact on the highway network is unlikely to represent a significant issue.</p> <p>The Parish Council agrees that the Concept Plan could be amended to identify Saxon Way as the vehicular access point to the site.</p> <p>The Parish Council has nothing to add to its original comments.</p>
<p><b>DHA Planning on behalf of Obsidian Strategic Asset Management Ltd</b></p>	
<p>Neither DHA Planning nor Obsidian Strategic Asset Management Ltd commented at Regulation 14 consultation stage</p>	
<p>Obsidian control 'Land East of Broomfield' and are promoting the site for residential allocation as part of the emerging Local Plan process.</p> <p>Comments are submitted, as summarised below, on four of the NP policies:</p> <p><b>Policy BFD2 – Protecting Broomfield’s Landscape Character</b> A Landscape and Visual Technical Note is submitted with the representation suggesting that the development of the site they are promoting would “not undermine the integrity of these landscape qualities” of the site.</p> <p><b>Policy BFD8 – Housing Mix</b> It is requested that the “policy should make it absolutely clear that private mix must be dictated by the market.” The representation also notes that the Preferred Options Local Plan consultation sets out a different mix.</p>	<p>The promotion of the site through the Local Plan process is noted and a matter for the City Council.</p> <p>Given that the NP does not propose to allocate the site, the conclusion as to whether the development of the promoted site would undermine the landscape qualities is a matter for the City Council in determining Local Plan allocations.</p> <p>Paragraph 63 of the NPPF (December 2019) specifically states that “Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.” Nowhere does the NPPF state that the market should decide. The current Local Plan policy for housing mix (Policy DM1) is not a strategic policy and therefore the Neighbourhood Plan does not have to be in general conformity with it.</p>

Summary Comment	Parish Council response
<p><b>Policy BFD10 – Land East of Saxon Way</b>  The representation states that it is not clear why the Land East of Saxon Way has been carried forward for allocation within the NP, contrary to the findings of the Neighbourhood Plan Site Options Assessment, when there are other more suitable sites in Broomfield.</p>	<p>The <a href="#">Neighbourhood Plan Site Assessment Report</a> scores both the site East of Saxon Way and the site promoted by the representation as being “potentially suitable for allocation in the Neighbourhood Plan.” Also, the Examiner will note that the development site proposal within Policy BFD 10 is much smaller than the site originally put forward through the Call for Sites, and is different in nature.</p>

**Appendix 1 – email from landowner re: Policy BFD10**

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**From:** Richard Stubbings [REDACTED]  
**Sent:** Thursday, August 29, 2024 4:00 PM  
**To:** Mark Hembury <Clerk@broomfield-pc.gov.uk>  
**Subject:** Re: Land east of Saxon Way - Broomfield Neighbourhood Plan

Dear Sir,

As a Broomfield family for many generations, and as land owners in the parish we are supportive of the concept being proposed for our land at Champion Farm as set out in the Neighbourhood Plan.

We are committed to negotiate with the Broomfield Parish Council to try to achieve a successful outcome for our land.

Yours faithfully  
Richard Stubbings  
Sent from my iPhone