

Chelmsford City Council Local Plan

Statement of Case of the North and West Parishes Group, which comprises: Broomfield Parish Council, Chignal Parish Council, Little Waltham Parish Council and Writtle Parish Council

Part 2: Matter 6 – 6d, 6e, 6b, 6a (Week 2)

November 2018



Chelmsford Local Plan and Sustainability Appraisal

Statement of Case of the North and West Parishes Group

1. This Statement of Case is submitted on behalf of North and West Parishes Group (“The Group”) in relation to the Chelmsford City Local Plan. The Group submitted representations under Regulation 19 at the appropriate time and set out their concerns in relation to the Plan in terms of the overall strategy and specific matters.
2. This document follows the Statement made in relation to Week 1 of the Examination and is made in the same context, namely the concerns of these Parishes about the proposed strategic sites in or near to their Parishes around the north and west of Chelmsford.
3. This Statement sets out the key matters of concern of The Group in relation to this Plan and its preparation, in the context of the Matters being considered at the Examination.
4. The Group is in agreement that they have been consulted by Chelmsford City Council at every stage of consultation, but they retain concerns that the responses to consultation have not been adequately reflected at each stage of the Plan preparation.
5. The Parishes Group also fundamentally has concerns as to the process which has led to the preferred option for the future growth of the Chelmsford Area.
6. In the preparation of this Statement of Case, The Group has sought to limit repetition from previously provided representations and, as such, the comments made in these submissions still stand.
7. Some of the Parishes have also independently worked on Statements of Common Ground with Chelmsford City Council, which (where agreed) are provided as separate documents to the Examination.

Week 2

Matter 6: Housing Provision

Q42; Is the Methodology for housing site assessment and selection as set out in the SLAA documents EB072A and EB072G sound?

a) Do the absolute constraints and criteria for suitability, deliverability and achievability accord with national planning policy and guidance?

8. We have set out in representations that adequate consideration was not given to a Green Belt review and that there would have been a justification in undertaking such a review, in accordance with the NPPF, in identifying and then assessing the most appropriate locations for growth.
9. EB072C sets out the 'Absolute Constraints' against which sites were rejected, which includes:
 - Site lies in the Metropolitan Green Belt
 - Site lies within a Green Wedge or Green Corridor.
10. In terms of the Green Wedges and Green Corridors, it has also been set out in representations that the weight given to these is not considered appropriate and that by putting this in as an 'absolute constraint' it is assuming that these policies will continue in the Plan before they themselves and the merit of them has been tested.
11. Furthermore, the criteria for assembling specific sites into options at the Issues and Options stage are very unclear, unjustified and therefore prejudicial to subsequent stages of the Plan, as outlined in earlier representations.
12. The extent to which these criteria have been used to inform the locations for growth in the Plan is therefore not sound.

Q49; Are the housing allocations in Location 1: Chelmsford Urban Area, Location 2: West Chelmsford and Location 3: East Chelmsford, justified and deliverable?

Location 2: West Chelmsford

13. The growth at West Chelmsford is not in a sustainable location and the nature of growth is not in keeping with the rural nature of this location.
14. There is no national level guidance in planning policy on acceptable walking distances, however it has been accepted in many assessments in cases that 2km is a reasonable extent to walk to services. There is other evidence that shorter distances would be appropriate, up to a maximum of 1,200 in non-urban locations (The Guidelines for Providing for Journeys on Foot (IHT, 2000, para 3.30).
15. The eastern part of this site is approximately 2.5km from the station, with the majority of the site even further removed. It is beyond acceptable walking distance to the city centre

and Chelmsford railway station. Residents would need to use other transport modes, including cars.

16. As identified in the Essex Highways Preferred Option (PO) report, the A1060 corridor will experience worsening congestion by the end of the Local Plan period, which would impact on the journey time and reliability of bus services. There is also no space within the public highway to provide bus priority measures on Roxwell Road which would improve bus journey times, or designated cycle paths
17. The growth allocation would result in an unreasonable highways impact on the A1060/ Lordship Road junction and on the Roxwell Road/Chignal Road Junction. It would generate around 160 additional vehicle movements on Lordship Road to/from Writtle in each peak hour. This would lead to increased pressure on this already heavily congested area particularly due to the multiple entry and exit points from the Writtle University College, The Doctor's Surgery and the Preston's Garage interchange together with on-street parking, which has not been adequately modelled.
18. The nature of growth is not in keeping with the rural nature of this location and the allocation would result in a significant loss of Grade 2, best quality agricultural land. It would require the development of sensitive landscapes, with impact on a special landscape area and does not represent a sustainable growth of the rural area in which it is situated.
19. There are also issues in terms of the extent of social and educational infrastructure provision (including secondary school provision) and the impact on the adjacent local communities.

Matter 6b: Growth Area 2: North Chelmsford

Q52: Are the housing site allocations in GA2 within Location 4: North East Chelmsford, Location 5: Great Leighs and Location 6: North of Broomfield justified and deliverable?

Location 4: North East Chelmsford

20. The North and West Parishes Group has significant concerns in relation to the proposed development at Location/ Site 4 (North East Chelmsford). These have been set out in representations.
21. The extent of development proposed in this location places an unsustainable development burden on this area of Chelmsford. There is significant risk in terms of its delivery, as a result of complex land ownership and overdependence on specific housebuilders, and it relies heavily on significant and unproven infrastructure provision.
22. The growth in this location is reliant on the delivery of the Chelmsford North East Bypass. It is recognised that Essex CC and Chelmsford CC have submitted a bid to the government's Housing Infrastructure Fund (HIF) which has *"been successful at the expression of interest stage to move to the final stage, for up to £250m grant to be directed to the delivery of the Chelmsford North East Bypass and Beaulieu Rail Station."* This however does not guarantee this funding and there is no further information about the status of this bid or the timing of it. There is therefore still considerable uncertainty as to the delivery of this infrastructure

needed to deliver this growth area. Without this, there will undoubtedly be unacceptable impact on the surrounding communities and existing infrastructure.

23. This is an isolated location for this level of growth, which will not link with the existing surrounding communities, yet will impact them as a result of the associated traffic and increase in population.
24. It also requires development on high Grade 2 agricultural land and would place too much strain on the adjacent Green Wedges and Green Corridors. As such it will have an unacceptable impact on the communities and landscape of the areas to the north of Chelmsford. This is not a sustainable or preferable strategy for growth and consideration should have been given more extensively to other options at the early stages of this Plan process.
25. For these reasons, the Plan should also be considering additional sites where development can be brought forward alongside the delivery of Location/Site 4, such as Hammonds Farm, to relieve some of the pressure on this area and create further options for growth in terms of market delivery. The early stages of the Plan should have looked more extensively at other sustainable and deliverable options for growth and included a Green Belt review to inform this process and so that they could reasonably have been compared against the merits of this site.

Location 5: Great Leighs

26. The development at Great Leighs is acceptable in principle, subject to delivery of the necessary infrastructure in a timely manner. Without this, the impact on the surrounding areas of Broomfield, Chignal, Great Waltham, Little Waltham and Writtle will be wholly unacceptable in terms of traffic and pressure on infrastructure. This is because minor and unclassified roads in these areas would offer the most direct route to the southbound A12 in the AM peak (and in reverse during the PM peak). This would have safety considerations and would also impact the character of these areas.
27. Without a full dual carriageway NEC Bypass, the development of Great Leighs will impact the roads around Boreham Road and Goodmans Lane and the B1008 through Broomfield, as a result of resulting congestion on the A131/ A130 Essex Regiment Way. This has not been given adequate consideration in the proposals for development in this area.

Location 6: North of Broomfield

28. The growth North of Broomfield would have significant impact, particularly in terms of pressure on infrastructure and roads.
29. There are alternative locations which could more sustainably accommodate this level of growth, such as at Hammonds Farm and around the A130 south corridor where existing infrastructure is more robust.

Traffic

30. The B1008 is the only route for accessing Broomfield Hospital, the principal acute hospital serving mid-Essex. The largest population centres served lie to the south and east, so the most direct access is from the south.
31. The TTHC traffic modelling indicates that the proposed new access road through the site allocation would alleviate traffic north of Hospital Approach, but not to the south. It shows that 75% of traffic from Location 6 will use the B1008 south, adding 8-10% to traffic levels at peak times.
32. The B1008 is already operating at 96% capacity at peak times. It includes the Main Road/School Lane junction which is classified by the ECC PO Study as 'over-capacity' now and in all development scenarios and is no longer due for mitigation.
33. The ECC PO Study also states that "modelled congestion is shown to worsen along corridor routes into the city centre – notably (*inter alia*) the B1008 Main Road through Broomfield".
34. Any failure to secure the North-East Bypass in a timely manner would further increase congestion on the B1008, due to the site allocations at Great Leighs and North-East Chelmsford.
35. It is to be considered under Matter 7, Special Policy Areas, Question 51b if it is appropriate for Policy SPA1 ' to require the proposed development at Strategic Growth Site 6 to provide an access road to the Hospital from Main Road'.
36. If considered inappropriate, or if the site developers and Mid-Essex Hospitals Trust were unable to agree the arrangements for the access road, the traffic implications for the B1008 would be highly significant and unacceptable. Furthermore, the rationale for this site being considered strategic would cease and it could not be considered to be justified.

Location, Connectivity and Local Services

37. Location 6 is a northern extension to the Broomfield settlement area, which is already an elongated settlement stretched along 2 km of the B1008 (including NCAAP sites under construction). The bulk of Location 6 is more than 5 km from Chelmsford rail station.
38. A planned cycle path would connect Location 6 to Broomfield village but there is no cycle path connecting Broomfield village to the city centre, as the existing cycle path terminates at Valley Bridge.
39. Within the adjacent Green Wedge, there are no cycle paths or PRowS connecting Location 6 to Broomfield village centre and points further south.
40. Therefore, together with the high cost of bus travel, it is likely that connectivity between Location 6 and Chelmsford city centre will be heavily reliant on private cars.

41. The development spreads into Little Waltham Parish. There is existing pressure on local schools and health facilities in both Little Waltham and Broomfield, which would be exacerbated as a result of development in this area and which will in turn increase pressure on roads and transport infrastructure.

Landscape Setting

42. The reduction in dwellings from 800 to 450 is strongly supported. However, it is unclear why there has been no decrease in the footprint of Location 6.
43. EB100A (Landscape Sensitivity and Capacity Assessment) indicates the increasing sensitivity of the landscape from east to west, from land parcel BFLP1 to BFLP2. The Broomfield Neighbourhood Plan Landscape Appraisal has also underlined the greater sensitivity of BFLP2.
44. Therefore, the footprint of Location 6 should be reduced, broadly in line with the reduction in dwellings, with a greater focus on BFLP1. Alternatively, significant landscape mitigation, for instance new woodlands, should be specifically identified at a strategic level within the site, along the western and northern boundaries.

Conclusion

45. The North and West Parishes Group hereby sets out its overriding considerations in relation to the Plan, which are presented in detail in the previously provided representations. These remain relevant in the Examination of the Plan and for these reasons, we believe there are fundamental amendments required to this Plan to reflect these concerns and ensure its soundness.