

CHELMSFORD LOCAL PLAN AND SUSTAINABILITY APPRAISAL
STATEMENT OF CASE OF THE NORTH AND WEST PARISHES GROUP
WEEK 3 - MATTER 8 – INFRASTRUCTURE

Introduction

This Statement of Case is submitted on behalf of North and West Parishes Group (“The Group”) in relation to the Chelmsford 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, and the comments in these submissions still stand.

This Statement responds to the Inspector’s Questions for Matter 8 – Infrastructure.

Q75. The Plan sets out a range of infrastructure requirements which have been identified through the Council’s ‘Infrastructure Delivery Plan Update’ (IDP) (EB018B). Is the approach set out in the IDP for identifying necessary infrastructure justified and consistent with national policy?

Although the Local Plan is being assessed against the original NPPF, it is worth noting that the 2018 NPPF states in paragraph 34 “Plans should set out the contributions expected from development. This should include ... infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan.”

The IDP Update includes indicative costs for the transport infrastructure which will be required during the Plan period, and divides these costs among the relevant sites. This approach is justified and consistent with national policy.

Q76. The Plan sets out in Strategic Policy S11 the approach to be taken for the provision of necessary infrastructure and lists some specific infrastructure requirements in relation to transport and highways, flood risk management, community facilities, green and natural infrastructure and utilities.

a. Are these requirements based on robust evidence, are they all necessary to support development during the Plan period and are they viable and deliverable within the timescales of relevant site developments?

ECC's transport modelling¹ includes the Local Plan allocations and future infrastructure measures such as the Chelmsford North East Bypass (CNEB). The modelling includes a VISUM wide-area model of the Chelmsford highway network. This was found to validate against observed data sufficiently well for the urban area of Chelmsford, but less well for the peripheral areas, so individual junction models were developed alongside the wide-area model. For the individual junction models, the report states that "Trafficmaster [data from DfT] has been used to validate whether the model outputs are reasonable for all junctions modelled", although there are no specific details of this. Further information is required to determine whether the individual junction models are robust. In the meantime, they cannot be regarded as sufficiently robust.

The allocations for SGS 4, SGS 5 and SGS 6 all require contributions to the delivery of the Chelmsford North Eastern Bypass (CNEB), and the route for this scheme is safeguarded in the Local Plan.

The full CNEB scheme² would provide a continuous grade-separated dual carriageway link between the A131 at Great Leighs and the A12 at Boreham. This would provide additional capacity and network resilience between Braintree and Chelmsford.

However, the ECC PO Addendum only includes "an aspiration" to deliver a partial single carriageway northern section (from Chatham Green to the committed Radial Distributor Road at Beaulieu Park) by the end of the Local Plan period in 2036. During this time, most of the proposed housing at SGS 4, 5 and 6 would be constructed and occupied.

The ECC Highways PO report identifies that the Deres Bridge, Sheepcotes, Pratts Farm and Channels Drive roundabouts on the A131/A130 corridor, and the A12 Junction 19, would all operate "Over Capacity" in 2036, even with the CNEB northern section in place. Therefore, the evidence base shows that the proposed level of development at SGS 4, 5 and 6 would be unacceptable without further highway capacity beyond that proposed in the Local Plan.

A bid has been submitted to the Housing Infrastructure Fund (HIF) for funding towards the CNEB scheme and Beaulieu Park railway station. However, this decision will not be made until summer 2019, so it cannot be assumed that this funding will be secured for the purposes of the Local Plan.

¹ Chelmsford Local Plan - Preferred Option Strategic & Local Junction Modelling - January 2018

² IDP Update, paragraph 3.7

As well as any potential public funding, the CNEB northern section would be dependent on contributions from multiple development sites. The smaller sites could be built before the bypass, or conversely, could not all come forward during the Local Plan period at all in time to provide funding towards the scheme. Representations from Tritton Family Partnership, who own some of the land required for the scheme, show that there is not agreement between the stakeholders involved, and cast further doubt on the CNEB's deliverability.

Q77. Has the effect of proposed development on the strategic transport network been adequately assessed? Does the Plan provide sufficient measures to avoid any severe cumulative impacts, including through mitigation, and maximise opportunities for sustainable transport?

General

Our previous representations set out concerns with the transport infrastructure proposed in the Local Plan.

The effects of proposed development have generally been adequately assessed at a strategic level by the ECC transport modelling. However, our previous representations included a more detailed examination of the vehicle movements which would be generated by some of the proposed allocations and concluded that there would be significant local impacts.

As set out in the response above to Q76 (a), if the CNEB northern section is not delivered during the Plan period, there would be significant cumulative traffic impacts on the A131/A130 and B1008 north-south corridors. The Plan does not provide certainty that sufficient capacity could be provided to mitigate these impacts.

Furthermore, the ECC PO report identifies that even with the CNEB northern section in place, the A12 Junction 19 in Boreham and the B1008/School Lane junction in Broomfield would still operate over capacity once the Local Plan traffic demands are taken into account.

All of the allocations include a requirement for "appropriate measures to promote and enhance sustainable modes of transport". The IDP update includes broad measures for each allocation, but some of these are based on very indicative costs (e.g. ChART extension for SGS 4) or have no costs shown (e.g. additional bus services and bus priority measures for SGS 2). Therefore at present, there is no clarity or certainty that these measures would come forward and so more information is needed to demonstrate that the Local Plan would maximise opportunities for sustainable travel.

SGS 2 – West Chelmsford

The ECC modelling does not reflect on-street parking on Lordship Road in Writtle village, which reduces the capacity of this link. The proposed development at West Chelmsford would increase the traffic flows here and lead to localised congestion.

The allocation requires a connection for cycling via Lawford Lane to National Cycle Route 1 (into central Chelmsford). This would need a controlled crossing of the A1060 Roxwell Road which is unrestricted (60mph). Lawford Lane is an indirect route without street lighting and would not necessarily be attractive for cyclists, particularly in darkness.

Roxwell Road itself would be a more direct route to central Chelmsford, but has no available space for suitable on-street cycle lanes along its full length. Without these, the apparent proximity of SGS2 to Chelmsford station ‘as the crow flies’ is misleading and irrelevant.

SGS 4 – North East Chelmsford

If the CNEB northern section is not delivered during the Local Plan period, then only a limited quantum of housing could be provided through the NE Chelmsford allocation without resulting in a severe impact on the local highway network.

Furthermore, although the traffic diagrams illustrate the principal routes to the north and west of Chelmsford, there is also potential for rat-running along unclassified rural roads further west as the A131/A130 and B1008 corridors become more congested. There is also potential for further rat-running through the Chignalls and Writtle due to the significant flow of traffic to/from the A12 south west of Chelmsford, which is shown in Figure 3 of the PSD to be the main direction of outward commuter flow.

As set out above, there are doubts over whether the CNEB northern section can be delivered during the Plan period. This creates two risks: firstly, that there would be no mitigation for congestion which will arise on the A131 and B1008 corridors with the new housing; and secondly, that the potential quantum of housing at SGS 4 (North East Chelmsford) would be reduced as the necessary supporting infrastructure would not be in place, thereby bringing its deliverability into question.

Even if the CNEB northern section is delivered, RDR 1 would prove insufficient for future traffic demands. As shown in the Group’s original representations, SGS 4 would generate approximately 20,000 daily vehicle movements and SGS 5 would generate approximately 4,200 vehicles. National design guidance shows that a single carriageway link such as RDR

1 would become congested with more than 23,000 daily vehicle movements.³ As the majority of traffic generated by the SGS 4 and SGS 5 allocations would route via the CNEB northern section and RDR 1 to/from the A12/A130 corridor, most of the capacity of RDR 1 would be taken up by these two sites alone, if not already taken up by the other committed sites such as Beaulieu Park and Channels. The proposed single carriageway link would therefore be insufficient for the overall quantum of development proposed in North Chelmsford by the PSD.

The SGS 4 allocation also relies heavily on the delivery of Beaulieu Park railway station. This was originally due to open in 2022 but is delayed until 2025, calling its timely deliverability into question.

This means that in the intervening years (and possibly much longer), there will be limited mode choice for the proposed allocations, particularly at SGS 4. This will lead to a predominance of car trips, contrary to Local Plan Policy S11, as the sites would not “help reduce congestion, link new development and provide connections in the strategic road network”. Again, this does not maximise opportunities for sustainable travel. It would also lead to rat-running through Little Waltham and some unclassified rural roads.

SGS 5 – Great Leighs

The allocation states that the allocation would need to contribute towards CNEB. However, if the housing at Great Leighs were to come forward before the CNEB scheme is completed, traffic would need to use the existing network, with the majority of traffic routing to/from the south of the allocation sites.

The most suitable existing route for this traffic would be via the A131/A130 (Essex Regiment Way), but due to existing congestion, some peak time journeys are already faster via narrow unclassified roads to the east such as Boreham Road and Goodmans Lane, or via the B1008 through Broomfield.

³ Design Manual for Roads and Bridges (TA 46/97) – Annex D – Congestion Reference Flows

SGS 6 – North of Broomfield

This allocation includes a new access road towards Broomfield Hospital to be funded by the development.⁴

The ECC modelling shows that the new access road would reduce traffic at the B1008/Hospital Approach junction, but not on the B1008 corridor further south through Broomfield village. Thus, there would still be a net increase in traffic on the B1008 corridor between Hospital Approach and the city centre.

Again, due to existing congestion, some peak time journeys are already faster via narrow unclassified roads to the west such as School Lane/Hollow Lane.

The ECC PO report identifies four key junctions on the B1008 corridor; of these, the B1008/School Lane junction would operate “Over Capacity” in 2036. The proposed SGS 6 allocation would increase traffic at this junction.

The worsening of congestion on the B1008 corridor is of particular concern as this is the only route to Broomfield Hospital, even assuming the timely completion of the new access road.

Q78. Does Strategic Policy S12 clearly set out how infrastructure will be secured and mitigation provided during the Plan period and is this justified, effective and compliant with national policy? Has the viability of providing necessary infrastructure been adequately assessed?

For the CNEB scheme, the IDP Update⁵ sets out indicative costs for SGS 4, SGS 5 and SGS 6; the majority of the costs would be funded by SGS 4. The pro-rata cost of the CNEB scheme per dwelling in SGS 4 would be around £16,000. This is before further consideration of other measures intended to be funded by the SGS 4 developer, including the ChART bus rapid transit scheme and a new pedestrian and cycle bridge over Essex Regiment Way, so the true cost per dwelling is in fact higher. These costs are relatively high for residential developments and so could risk the viability of the CNEB scheme.

⁴ IDP Update, paragraph 3.19

⁵ IDP Update, paragraph 3.11

In Broomfield, a mitigation scheme had previously been identified for the B1008/School Lane junction. However, this was to be delivered by the “Broomfield Place” allocation which has not been included in the PSD, so it is not now secured.

Q83. Are any changes to the infrastructure policies necessary for reasons of soundness?

- Further information is needed to determine whether the transport modelling work which supports the Local Plan is robust.
- Notwithstanding this, the modelling shows that the partial CNEB scheme in the Local Plan will be insufficient to provide capacity in 2036.
- If the CNEB does not come forward as envisaged in the IDP Update, only a small level of development at SGS4, SGS5 and SGS6 could be built out. Therefore, the policies need to provide more certainty on the funding and delivery of strategic transport infrastructure to be sound.
- The suggested measures to promote sustainable travel at SGS2, SGS4, SGS5 and SGS6 are not described in sufficient detail to confirm that they would succeed in this aim, and so these sections of the policies should be reviewed accordingly.

Without these changes, the PSD cannot be regarded as sound. The North and West Parishes Group’s representations have drawn attention to other spatial options where there is more dependence on existing infrastructure (as opposed to planned/aspirational infrastructure) and which would therefore present a sound option.