CHELMSFORD LOCAL PLAN REVIEW 2022-2041

Examination Hearing Statement

Matter 6 – Site Selection **Issue 1 – Site Allocations**

Growth Area 2 – North Chelmsford **Location 9 - Boreham**

Re. Strategic Growth Site Policy 9a (SGS 9a) – Waltham Road Employment Area, Boreham

Submitted by Mr. Alan Swash and Mrs. Jennifer Swash

October 2026

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1. Introduction

1.1 This Hearing Statement for the Examination of the Chelmsford Local Plan Review 2022-2041 is submitted by Mr. Alan Swash and Mrs. Jennifer Swash, the owners and occupiers of The Owls, Waltham Road, Boreham, Chelmsford, Essex. CM3 3AX.

1.2 Our property is the closest residential property, on the western side of Waltham Road, to the site that is Strategic Growth Site Policy 9a (SGS9a), proposed in the Local Plan Review as an extension of the existing Waltham Roof Employment Area Boreham.

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1.3 We have resided at The Owls for over 50 years, and are obviously fully familiar with the history and development of the Waltham Road Employment Area over that period.

1.4 Our position Is that we object in the strongest terms to this Policy SGS9a, and that it should be deleted from the Local Plan Review.

1.5 We trust that Inspectors have read the representations we submitted concerning the Waltham Road Employment Area at the Regulation 19 Pre-Submission Consultation that was undertaken by the City Council in February/March 2025 and more recently at the Regulation 19 Focused Consultation on Additional Sites undertaken in November/December 2025.

1.6 The Inspectors will have noted that, at earlier stages in the local Plan Review process, the proposed expansion of the Waltham Road Employment Area was for an additional 3,500 sq.m. of (net) new floorspace at the site. At the more recent Regulation 19 Focused Consultation on Additional Sites the total proposed new floorspace was increased to around 14,000 sq.m. over a much larger site area.

1.7 The proposal has increased in size, in terms of floorspace by 400%, and the site allocation area has been increased to now extend northwards to the boundary of our property. The amount of employment floorspace at the site as a whole, including the existing premises, will increase by around 250%

1.8. The City Council has taken no account of our previous representations regarding the impacts upon our residential amenities during the Local Plan Review consultation process.

2. The Inspectors' Questions

2.1 The Inspectors have raised the following questions regarding this proposal, and our responses to those questions are provided below

Item r. What is the likely impact of the proposed allocation on the following factors:

- **The strategic and local highway network including public transport and active travel**

We consider that this issue must be considered in a much wider context. The City Council is planning for further significant levels of residential development at Great Leighs, and there is also substantial growth planned on the southern side of Braintree. These proposed developments will undoubtedly lead to further increases of traffic along Waltham Road heading to/from the A130 and 1he A131. The City Council's Highways Impact Junction Modelling Appraisal (October 2025) (Document T007) prepared to support the Regulation 19 Focused Consultation on Additional Sites did not assess the impacts upon the Waltham Road/Main Road (B1137) junction at all, and only projected an additional 33 traffic movements from the extended Waltham Road Industrial Estate in the AM peak, and an additional 23 traffic movements in the PM peak from an additional 10,500 sq.m. of Class B2 floorspace rather than from the Plan's proposal for 'around 14,000 sq.m. of floorspace'. In other words, the traffic projections for the Waltham Road Industrial Site may have been under-estimated by up to 40%, simply by failing to take into account the correct projected new floorspace, and the impacts upon the Waltham Road//Main Road junction may also have been under-estimated if full account has not been taken of the traffic generated by the future residential developments mentioned above or even recently approved employment schemes such as the Bio-Fuels filling station on Main Road Boreham which is conservatively predicted to generate an additional 450 to 500 HGV movements per day.

We have little confidence that the Highways Impact Junction Modelling and wider Traffic Modelling of the North Chelmsford network, including the A12, has taken full account of the impacts upon the village of Boreham arising from the cumulative levels of growth being planned in North Chelmsford and beyond. Those impacts are likely to be severe or very severe on those occasions whenever parts of that network are closed for maintenance or due to road traffic collisions, such events are frequent.

We consider that the potentially flawed approach to the Highways Impact Junction Modelling conceals a far worse traffic situation at the Waltham Road/Main Road (B1137) junction, and that there will be a need for significant junction improvements arising from the levels of potential future traffic growth, with signalisation of the junction being a minimum requirement. The SGS9a proposals do not set out any such requirement, in the mistaken belief that the traffic conditions at this junction will not worsen.

The Policy does not set out any specific requirements to promote and enhance public transport and active travel in the Boreham area, beyond a generic statement to incorporate "*appropriate measures to promote and enhance active and sustainable*

modes of transport" as a site infrastructure requirement. It is the case that there are no public bus services or cycleways serving Waltham Road, to the north of the railway line. Any suggestion that there might be active footpaths to the west of Waltham Road giving access to Beaulieu Park Station have no credibility as part of a travel plan strategy.

• Agricultural land quality, landscape character and heritage assets

As the Inspectors will see, Boreham is a village set within an attractive rural area in an agricultural setting.

Boreham Village is set high with long views in all directions. The village has very few high buildings, and in fact the large warehouse at the existing Waltham Road Industrial Estate is the tallest building in the village, with the exception of the historic Parish Church, and it is visible in long-distance views of the village from most directions. It is clearly visible from our property, and detracts from the wider views looking southwards towards the River Chelmer and its valley.
Unless there are strict planning controls placed upon the height of any new buildings, it is extremely likely that there will be adverse visual impacts upon the landscape character of the surrounding area. In the case of our property, there will be a serious adverse visual impact, and potentially featureless rear elevations of modern industrial buildings impacting upon the entire southern vista from our property, degrading from the rural character of the area that surrounds our property.

We are not satisfied that the Policy contains adequate guidance on these issues, beyond stating that two of the development principles are to "*conserve and enhance local landscape character*" and to "*provide for a mix of building size and styles including building design measures to soften* visual impact".

• Biodiversity

The impacts of this proposal upon biodiversity in the area are all negative. To the west of the site is an area of Ancient Woodland and a stream, which includes the protected Small-Leaved Lime (Tilia Cordata). This is the largest concentration of this species in South Essex and will be at risk from pollution from the expanded site. To the east of Waltham Road is the Parish Council's wildlife area Chantry Field and Boreham Bowls Club, there is a wide range of wildlife within the local area, including barn owls, bats, badgers, deer, pheasants, partridges and newts. The habitats of all these species are likely to be threatened by this development proposal, and the existing undeveloped land which comprises this proposed site allocation forms a considerable part of those habitats.

• Flood risk

In our view, the principal risk of flooding arising from the development will be in terms of surface water flooding arising from the extensive areas of hardstanding that are likely to be required for vehicle parking and external storage areas. This can be mitigated by a requirement for Sustainable Drainage Systems (SuDS), which is included within the Policy

• Air quality, noise and light pollution

These are likely to be the matters where there will be the most serious adverse impacts upon our residential amenities. Our dwelling, 'The Owls', is located directly to the north-east of the proposed site allocation. The most significant impact is that arising from traffic generation which involves a large number of HGV and PCV movements throughout the day, but particularly during the peak periods when combined with the traffic flows travelling along Waltham Road to/from Great Leighs, Braintree etc. There is now significant peak-hour congestion at the Waltham Road/ Main Road (B1137) junction just to the south of the Industrial Estate. The existing queue of traffic heading southwards in the morning peak period frequently extends back along Waltham Road to our property, and beyond. This has obvious implications for air quality in the area at such times, arising from emissions from queueing traffic

Furthermore, we experience other adverse environmental impacts arising from the operations and activities undertaken at the Waltham Road Industrial Estate. We presently experience noise, dust, windblown litter and general disturbance arising from the various industrial (mainly Class B2) uses at the site. This becomes significantly worse during the Spring and Summer months, when the prevailing wind direction is from the south/south-west.

The existing uses at the site include a large bus depot, car repair businesses, a vehicle scrapyard and various industrial/warehousing operations that generate HGV movements. These are typical users of Industrial Estates such as Waltham Road and there is little prospect that this mix of uses will change significantly by the proposed extension of the Site.

The Waltham Road Industrial Site is already floodlit at night, for security reasons, and the glare from the high-intensity floodlights is already a nuisance for us, both within our house and outside within our garden. It is probably the case that when the floodlighting was installed, no realistic assessment was made of its impacts upon any of the nearby residential properties. Again, the prospect is that this floodlighting would be extended to cover the whole of an extended Industrial Site, in which case our living conditions would be made intolerable. It is extremely unlikely that any effective mitigations would be possible, however much the lighting units might be screened, as it is the lateral glare from multiple lighting units on high lighting poles that is the principal nuisance. We invite the Inspectors to view the glare that we already experience from the existing floodlights.

Therefore, the prospect for the residents of Waltham Road, and principally for ourselves, is that the levels of noise and disturbance from industrial (Class B2) uses that we presently experience will increase substantially, with consequential impacts upon the quality of life and our residential amenities.

• Utilities

There is no mains sewerage serving the Waltham Road area to the north of the A12 and the railway line, nor any gas mains. Foul sewage from the development will therefore, have to be stored in large underground cesspits or septic tanks, and these are frequently within the landscaping areas of commercial developments, sited away from the buildings. We strongly object to the prospect of such tanks being sited in close proximity to our dwelling.

Item s. What mitigation measures would be needed to ensure a sustainable form of development and are they clearly set out in the policy?

The policy, and its supporting justification, fail to set out the mitigation measures that would be necessary to make the proposed development of the site sustainable. Neither the Policy SGS9a nor the Integrated Impact Assessment (IIA) have taken account of the direct proximity of our property to the proposed extended Employment Area, beyond a site development principle in the Policy to "*ensure no adverse impact on the living conditions of existing adjoining residential development*" and statements in the Reasoned Justification at paragraphs 2.63 and 2.66 that:

> *"2.63* ***The design and layout of proposals will also need to incorporate structural and buffer landscaping along the northern and western boundaries and provide landscape compensation measures.*** *Landscape buffers should incorporate hedgerow strengthening and tree planting as well as other biodiversity enhancements and should seek to make linkages to the nearby local wildlife site, Boreham Road Gravel Pits, to the west of the site*." (Our emphasis)
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> *"2.66* ***Some residential development lies to the north and east of the site. The development will be expected to provide suitable measures to ensure that the amenity of those residents is not adversely affected such as noise attenuation measures and boundary screening.""*** (Our emphasis)

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It is our view that these proposed mitigations are insufficient, and probably likely to be completely ineffective, in light of the adverse impacts and nuisances that arise from the existing uses and operations at the Waltham Road Employment Area

Item t. Is the proposed scale of development justified, having regard to any constraints and the provision of necessary infrastructure?

We consider that the scale of the proposed expansion of the Waltham Road Employment Area in this rural area, is disproportionate when compared to other Rural Employment Areas in the district, noting that the scale of development has been increased by 400% between the two Regulation 19 consultations. In our view, this, brings into question whether the City Council has undertaken a full site-selection assessment of more suitable and far better located, sites that could accommodate the planned level of new development. It is the case that, if this proposed site allocation is endorsed by the Inspectors, the Waltham Road Employment Area would become the largest employment area outside the urban areas of Chelmsford and South Woodham Ferrers. It would effectively become one of the City Council's 'strategic employment areas' by virtue of the quantum of development at the site, and yet it is located within a rural area. This is a paradox, and is a clear sign of poor disjointed planning.

It is our view that new employment floorspace of the scale now being proposed will not serve local needs in Boreham and required through Policy 4 of the Neighbourhood Plan, but will serve those occupiers and businesses seeking sites with accessibility to the strategic road network (A12/A130/A131). Such development should, therefore, be focused on sites with far better accessibility to those roads, and not within the rural area around the village of Boreham requiring all traffic to travel through the village,

Item u. Are changes to policy wording required to ensure that development does not impact defence operations or assets

We do not identify any necessary changes to the policy wording to take account of defence operations or assets.

3 Conclusions

3.1 The plain and simple fact is that this proposed extension of the Waltham Road Employment Area is too large, at the wrong location and with the proposed allocation site boundary now extending at its north-eastern corner to directly abut our property. This proposed allocation exceeds the need to provide additional employment land for the village of Boreham and its local economy, and a much more limited extension of the existing employment area would suffice to meet that need. This is manifest by the fact that, if this allocation is confirmed, the Waltham Road Employment Area, in terms of employment floorspace, would become the largest employment area within the Council's area, outside the principal urban areas of Chelmsford and South Woodham Ferrers. It would be equivalent to being a 'Strategic Employment Area' within the countryside with completely inadequate infrastructure provision, and with the prospect of some serious environmental problems for the Boreham community. This is not good planning.

3.2 Furthermore, we have no confidence that any of the necessary mitigations that will be required to make this proposal acceptable, in the context of the site's location in close proximity to our dwelling, will be effective in controlling the nature and type of business activities that are likely to be attracted to this site. By way of one example, in all likelihood, the projected landscape buffers will take up to 15 years to reach a mature level, whereby, even then, only some of the visual impacts are likely to be screened. Our experience is that the existing Waltham Road Employment Area, part of which is under the control of the same landowner who has submitted this site to the City Council for consideration, generates a range of environmental problems, and these are only going to increase as a result of this proposal. As we have stated, we have lived at our dwelling for the past 50 years, and the various environmental problems arising from the uses and businesses at the existing site have increased across that period.

3.3 We consider that this proposal does not represent an appropriate or effective strategy for meeting the need for the sustainable growth of businesses in the rural areas.

3.4 We also consider that the proposal and its accompanying IIA assessment has not been justified, in that its potential adverse impacts upon our residential amenities, and those of other residents in Waltham Road, have not been addressed, and that the proposed mitigations, largely in the form of '*robust landscape buffers'* will fail to prevent the full impacts of the development being felt and seen by nearby residents.

3.5 The proposal will effectively blight our property and will probably result in a significant devaluation should it be placed on the housing market, when compared to the current position. Very few potential buyers will wish to live next door to an industrial estate, and nor do we.

3.6 We request that the Inspectors undertake a site visit to see the proposed allocation, and that they take the opportunity to view the site from within our property. We shall be

happy to facilitate that visit.

3.7 To conclude, we seek a Main Modification to the Submission Plan that, in our view, should delete this proposed site allocation from the Plan, or alternatively, if the Inspectors consider it to be necessary, to reduce the extent of the proposed allocation to that which was originally contained in the Regulation 19 Pre-Submission Plan., This proposal does not constitute sustainable development, and is neither Positive, nor Appropriate or Effective and, in our assessment renders the Plan unsound,

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