Boreham Conservation Society – AS1050 and AS1019

Location 9 – Boreham Strategic Growth Site Policy 9a - Waltham Road Employment Area

Point r

The addition of over 10,000 sqm of a general industrial and distribution employment area and the associated increase in commercial vehicles, including HGVs, together with the employees' private cars will materially increase the number of trips to and from Waltham Road. The Site is accessed from Waltham Road which is classified in the Essex Functional Route Hierarchy as a secondary distribution / local link road to carry local traffic. It was not designed to be a route for commercial traffic. National Highways Junction Assessment Report states "At Waltham Road, the junction operates satisfactorily in 2027 but by 2042, would be overcapacity in both weekday AM and PM peak hours, with queues of up to 100 vehicles and delays over 20 minutes". Waltham Road is already an established rat run with commuters seeking to avoid congestion elsewhere. Residents confirm currently queues normally extend beyond the site access point. CCC's recent approval of a Biofuel Station (25/00339/FUL) on the Main Road (B1137), will add around 450 extra HGV journeys to the B1137 a number of which will route through Boreham and the Waltham Road / Main Road junction with the latter under capacity pressure when regularly functioning as the Emergency Diversion route for the A12. Additional traffic will increase air and noise pollution both of which are increasing towards statutory health limits. The health issues were a major issue for CCC in relation to the A12 widening Scheme and remain a major concern for BCS.

CCC state in the Regulation-22-consultation-statement-june-2026 that "The Council commissioned Essex Highways to review and consider the key issues raised in the highway and transportation responses received to the consultation. This report entitled Preferred Spatial Approach - Response to Representations (November 2024) is given in Appendix 2 and includes a review of the Transport Technical Note, prepared by Stomor (June 2024) on behalf of Little Baddow, Danbury, Boreham and Sandon Parish Councils." While the proposed area expansion of Site 9a is mentioned, no data is given on traffic issues. The EH review also states - Additional Sites (Regulation 19) Highways Impact Junction Modelling Appraisal October 2025 "Whilst it is recognised that a consistent approach to the use of trip rates is important across the Local Plan evidence base development, it is important to reiterate that the trip rates used are nevertheless more appropriate for sites with very good public transport and active travel links. If the latest development proposals do not achieve the same level of sustainable infrastructure provision, and subsequent uptake akin to larger development sites, then trip rates would be expected to be higher. ECC and CCC are, however, committed to working with developers of all Local Plan development sites to best ensure that aspirational mode share targets for active and sustainable travel are achievable. This, it is felt, provides sufficient justification for the use of lower trip rates across the wider Local Plan Review appraisal."

Site 9a does not have very good public transport, or active travel links. The current site has few, If any, Boreham residents and the workforce commute by private car. The only cycle path to Boreham runs from Junction 19 of the A12 to The Lion Inn at the western entrance to the village, while the Main Road through the Village is perilous in the rush hour as would be navigating the

“T” shaped Waltham Road / Main Road junction. There is no justification for the use of aspirational trip rates nor the exclusion of Site 9a from the EH report.

The current Industrial Estate dates from the 1980’s and is recognised by Chelmsford City Council (CCC) as designated rural employment and industrial/warehouse area (Policy DC52) intended to safeguard local trades and sole traders. The made Boreham Neighbourhood Plan (BNP) has been adopted into Chelmsford City Council’s (CCC) statutory local development framework. The provisions of Policy 4 support the original intent and conflict with the development proposed by CCC’s at the Waltham Road Industrial Estate, Site 9a. Policy 4 states that in respect of “major development of new buildings” in rural settings outside the Defined Settlement Boundary, these will only be considered where it is proven that they meet a defined local need, within the Defined Settlement Boundary and are fully supported by the necessary local infrastructure and services.

CCC state the proposed expansion at Site 9a is a strategic necessity to meet needs at District Level created by additional housing provision elsewhere in CCC’s jurisdiction. The proposed development adding over 10,000 sqm of B2/B8 logistics and industrial with the potential for 24/7 operations cannot be reconciled with the rural preservation policies in the BNP or those of Policy 11 of the adopted Local Plan Strategic Policy 11.

Waltham Road is a primary route connecting Boreham to the countryside. The current industrial estate sits in a dip in the land and is barely visible from Waltham Road. The proposed expansion site would be on higher ground bordering the road and its presence would impinge on the open spaces that currently maintain Boreham as a rural village separate from the urban sprawl of Chelmsford and would seriously detract from the setting of the historic Chantry Farm.

Public utilities are very limited and the area does not have an established wastewater infrastructure.

Point s

While the issues with the Waltham Road / Main Road junction are well known, no practicable mitigation measures have ever been identified. The site entrance is immediately before a bridge and Waltham Road feeds traffic on the Main Road which is the designated diversion route for the A12. The proposed expansion recommends developers consider CCC’s mitigation policies and consider a financial contribution where appropriate. Specific measures or commitments are not set out in the proposal.

The boundary of the expanded Site would meet that of a private residence on Waltham Road and be directly opposite a row of dwellings. These residents already suffer noise and light pollution to the detriment of their right to quiet enjoyment of their properties. It is inconceivable that the increased noise and light pollution together with continuous traffic movements could be reasonably mitigated.

Point t

BCS contend that CCC have not proven the need for the amount of employment space proposed as it is not supported by the evidence and they have assumed the higher end of the

predicted range which far exceed recent history for delivery of employment space. Furthermore, BCS consider the lack of mains sewerage at the site to be a major constraint to the proposed development.

BCS request the Inspectors note that the commercial business employment space allocated adjacent to Beaulieu Park Railway Station is not being developed as a multi business site as intended. The Site is to be developed as a single employer Data Centre employing far fewer than intended.

Growth Site Policy 9b – Land to the East of 118-124 Plantation Road and Growth Site Policy 9c – South of Main Road and Dukes Wood Close, Boreham

Point v. Would the proposed sites provide a suitable location for older persons housing?

The short answer to this question is "No" for the reasons previously submitted. BSC would take this opportunity to add that both locations have significant severance issues that are difficult to mitigate. Active travel / public transport for the intended population would involve crossing either Main Road or Plantation Road where the speed and volume of traffic, including HGVs, pose obvious dangers. As regards Site 9b, BCS request the Inspectors to note that ECC Highways have refused a petition from residents requesting a 20mph speed limit on Plantation Road. The addition of a population older residents would necessitate a Pedestrian Controlled Crossing to ensure their safety which, due to the Site's proposed exit would be adjacent to a significant bend in the road, close to the junction with Main Road. The required crossing time on red to ensure safety, would inevitably create queuing traffic stretching back to the Plantation Road junction with Main Road and, in peak periods, on to Main Road. This would be at odds with Highways response "On both Priority 1 and Priority 2 Routes it is important to maintain free flowing traffic movement along them due to the function they perform within the network. "Plantation Road is a Priority 2 Route, primarily due to the volume of rat running traffic.

Similar considerations apply for site 9c. Main Road (B1137), the former A12, is also a Priority Route 2 and consistently carries a significantly higher volume of traffic, especially HGVs, throughout the day and at much higher speeds due to the 40mph speed limit. A 30mph limit would have been introduced had the A12 widening scheme been implemented. CCC's unconditional approval (regarding traffic flows) of the Biofuel site on the B1137 (25/00339/FUL), will increase HGV traffic heading to and from the north through Boreham. BCS have resolved to request a 30mph limit through Boreham and this plus a Pedestrian Crossing at the Site exit would be necessary to ensure a safe crossing, especially for an older population. Such a crossing, would further complicate traffic flow on the Main Road and at its adjacent junction with Waltham Road. The only traffic light pedestrian-controlled crossing on Main Road is, dependent upon mobility and dwelling location on Site 9c, 20-30 minutes walking distance.

Yours faithfully on behalf of Boreham Conservation Society Ltd,