

## **1. Introduction**

This is the response from the Little Waltham Parish Council (LWPC).

LWPC is also a member of the North West Parishes Group (NWPG), which has made a separate submission. As part of that group we instructed experts to assist us with our submission and the analysis of the Local Plan document. These reports are appended to this submission. There is a Planning Report from Castle Planning and a Traffic Report from TTHC.

Whilst we support what our experts say in their reports, and especially in connection with Site 2, in this submission we would limit our comments to matters that are of particular concern to LWPC.

## **2. General Comments**

We would make the following the general comments.

### **2.1 Excessive amount of development in one small parish**

We fully understand that there needs to be new houses built, and as such they need to go somewhere. What we would dispute is that a high proportion and indeed the largest site is contained within one small parish. There are justifiable concerns that the small village of Little Waltham will become swamped by the proposed developments and that it will lose its identity. We are also concerned that the urban sprawl of Chelmsford will subsume the village. The gap between Broomfield and Little Waltham will be lost and it will one continuous ribbon development. The countryside and natural break between Broomfield and Little Waltham will be lost and one will flow into the other.

### **2.2 Naming of Sites**

We are very concerned that the name “Little Waltham” does not appear very often in the plan document and even sites wholly and within the area of LWPC are not correct named in terms of their location. We cannot understand why CCC would do such a thing. For example Site 4 NE Chelmsford is wholly within the LWPC area – why is it not identified as such. Similarly, site 6 is called North Broomfield, again this site falls within the LWPC area. Quite what CCC are trying to achieve by not identifying these areas as Little Waltham is not easily understood, but has led to some unnecessary confusion.

## **3. Questions in the Consultation**

### **3.1 Do you consider the Plan Legally Compliant?**

We consider that the Plan is legally compliant in as much as it can be at present. The Government is seeking to issue clarification on its preferred approach with regard to methods of calculating housing need, and at such time it may be that CCC will need to review their processes and procedures for calculating housing need. It is therefore important that the Plan is flexible and can accommodate any new housing allocation that central government may implement.

### 3.2 Does the Plan comply with the Duty to Cooperate?

We assume yes, although it is not clear from the Plan.

### 3.3 Do you consider the Local Plan sound?

No

We do not consider that the plan is sound.

Our assessment is based upon several factors:

#### 3.3.1 Green Belt & Use of good grade Agricultural Land

We do not understand why Chelmsford City Council (CCC) did not at the outset of the Local Plan process review the Green Belt. We do not propose that any acreage of Green Belt should be lost, but suggest that it would be possible to exchange areas of green belt land classifications from the south of Chelmsford to the north. We believe that within the Green Belt to the south of Chelmsford there is a lot of poor grade agricultural land suitable for building; whereas the land on the sites that CCC have chosen to develop is of a much better grade and should be retained as prime agricultural land. Also as the majority of the Green Belt falls to the south of Chelmsford, that in and of itself has pushed any developments to the north of Chelmsford. Sites to the south of Chelmsford also have better infrastructure and are nearer the major commuting corridors of the A12 and A130

#### 3.3.2 Infrastructure

These matters are dealt with fully in the TTHC Report which is appended to this submission. However we would highlight the following comments.

Site 4 – The extent of this development imposes too much of a burden on this small area. There are significant risks in terms of delivery with multiple owners and with the site dependent on the delivery of significant infrastructure. Trip generation tables in the TTHC report shows that the development would generate around 1,800 vehicle trips in each of the peak hours, with an estimated annual average daily traffic (AADT) to and from the site of circa 20,000 vehicles. It is clear from this that the proposed developer funded NE Bypass being a single carriage way would become congested with an AADT in excess of 23,000 vehicles. Therefore any additional capacity gained from the Bypass would be negated by the development itself and that is before any other factors are taken into account such as more traffic from the north. There are concerns that any

congestion on the Bypass or Essex Regiment Way would lead to “rat-running” through narrow country lanes and the village of Little Waltham itself, where its narrow roads allied with a large proportion of on-street parking would become easily congested and detrimental to village life.

Site 6 – The basis for the inclusion of this site is the provision of a new access to Broomfield Hospital. However traffic flows in the TTHC report indicate that the development would generate around 200 vehicle movements in each peak hour, around 75% of this traffic would head south through Broomfield, representing an increase of 8-10%. The development would result in a net increase in traffic on the corridor between Hospital Approach and the city centre. LWPC are concerned that any issues on the new road would lead to rat-running through the village of Little Waltham.

North East Bypass – As originally conceived many years ago the Bypass was planned to be a continuous dual carriageway road that would allow drivers to get on at one end and off at the other. There were to be no junctions. That would mean that the traffic could move faster. What is now proposed is a pale imitation of the original concept. Within the plan the Essex Highways Addendum only indicates “an aspiration” to deliver a partial single carriage way, with junctions. That will mean that the proposed road will have very limited capacity and because there are various points to get on and off – this will encourage rat-running to get onto the road and also encourage drivers to leave the roads at the first sign of any congestion. The small country lanes and hamlets around the road will be at risk of being overwhelmed with traffic.

Cycle and Bus Lanes - Much has been made in the Plan of increasing cycle and bus lanes, however some of the most congested roads will not be able to accommodate these improvements due to fact that there is no space to increase the road width e.g. B1008. This in particular affects site 6.

### 3.3.3 Sustainability

We do not believe that sites 2, 4 and 6 are sustainable and therefore are contrary to Policy S1.

These issues are reviewed in the TTHC report, however the main issues are:

Site 2 - this site is beyond acceptable walking distance for local schools, retail facilities and the railway station. It follows that residents would need to use other transport modes. Their route would be along the A1060, which is a heavily congested road at the moment. There is no space to provide bus or cycle priority lanes on this road.

Site 4 - a vast new site in the middle of the countryside, comprising 3,000 houses and 45,000 sqm of employment floor space. Whilst the plan indicates that eventually there will be shopping facilities, health care and schools on site, most residents will have to leave the site for employment purposes. It is not possible to walk to the city centre as the distance is too far and cycling will be difficult as there are no dedicated cycle paths. Again in the plan there is an aspiration to build cycle paths - nothing more than that. The land over which the paths would need to be built is in multiple ownership and

therefore it would not be a straight forward task. Essex Regiment Way is a fast moving road with the national speed limit and therefore cycling along that road is very dangerous.

This development estimated Annual Daily Traffic (AADT) to and from the site would be circa 20,000 vehicles. The proposed mitigation for the traffic is the NE Bypass, however the type of road proposed would rapidly become congested with an AADT in excess of 23,000 vehicles, as most of its capacity would be absorbed by the allocation in the development alone, even before traffic to and from other existing areas and allocations are considered. That would be the scenario if the road was built, of which there is no guarantee. CCC have been unable to win any financing from central government and there would appear to be no desire for the roads to be funded either by CCC or ECC, therefore we will get the road that the developers choose to build, if anything at all. Any road built by developers will be constructed in an ad-hoc and piecemeal fashion, complicated by the multiple ownership of the land and no doubt various developers working on the site. The most worrying aspect is that the Essex Highways PO Addendum only includes “an aspiration” to deliver a partial single carriageway northern section by the end of the Local Plan period in 2036. During most of this time the proposed housing at site 4, Great Leighs and Site 6 will be completed and occupied. It is clear to see from the detailed analysis in the TTHC report that the roads in the area of site 4 would be at a standstill. Even if the NE Bypass is built as suggested by the developers its benefit will be negated as it too will be at capacity. There is no forward planning for any resilience in the system - and that alone makes the site completely unsustainable.

Site 6 - The main driver for this site is the new access road to the hospital that the developer has agree to provide. The proposed site whilst within the acceptable walking distance of schools is not within acceptable walking distance for retail facilities, therefore residents would no doubt resort to private cars for accessing retail facilities and for employment. Whilst the new road would reduce the traffic on the B1008 corridor to Hospital Approach, there would be an increase in the traffic between Hospital Approach and the city centre. Congestion on this part of the road, leads to rat running through small country lanes and hamlets. Little Waltham is particularly at risk of increased traffic through the village as drivers seek alternative routes.

### 3.3.4 Change in Behaviour

The plan talks about being able to change the behaviour of residents by getting them to use public transport, to walk or to cycle rather than using private cars for journeys. The plan says that such factors will reduce traffic by 5%, although this sensitivity filter is not used in the traffic projections. We think that such a figure is not accurate or achievable, for all the reasons set out in this submission and the appended Planning and Transport Reports. Footpaths and cycle paths would need to be built to encourage this “modal change”. Many of the roads around these sites are not suitable for retro fitting cycle paths or bus lanes. Some developers include a free bus pass for a year with the sale of the property. Research shows the take up for that is good, however after the initial year fewer people use the buses and subsequent usage reduction means a reduction in service and residents then go back to using their own cars for travel. So whilst there

may be an initial good take-up of public transport this is not sustained beyond the initial “free” period.

### 3.3.5 Alternative Sites

We believe that the plan is fundamentally flawed in seeking to locate so much of the new and large developments in one small area, in a small parish that up until now has been a rural area. Its very nature is set to be completely changed by the size and character of these developments. Looking at the traffic figures in the TTHC report we can see that 73% of residents of Chelmsford who drive to work use the A12 south towards Brentwood or the A130 towards Southend, a further 11,000 people travel to work by train. Therefore we would submit that the best approach in transport terms would be to locate future residential development close to the A12 and train facilities including the new proposed station at Beaulieu, this would avoid generating additional vehicle mileages across central Chelmsford.

We believe that as a result of CCC not undertaking a complete review of the Green Belt prime agricultural land will now be lost, and that as a result of this failure sites are being proposed in unsustainable locations to the detriment of the infrastructure at the present and the current residents in these areas. We are not proposing a loss of green belt land, but in effect an exchange of green belt land from the south of Chelmsford to the north. Sites in the south of Chelmsford are closer to both the A12, A130 and the new railway station at Beaulieu. Such sites that should be reconsidered are:-

Hammonds Farm - close to the A12, new station at Beaulieu and with the land within one ownership.

Sites at Boreham, Howe Green and Rettendon could also be developed - all of which are much closer to the A12 and have more sustainable and recently improved infrastructure which could support developments in these areas.

## 4. Conclusions

LWPC believe the Plan to be unsound for all the reasons expressed in this summary and the two experts reports which are attached.

In summary -

- Site 4 is unsustainable - the current infrastructure cannot support it and indeed any future developer led infrastructure will not have sufficient capacity for the development. Along with that there needs to be consideration of the increase of traffic from the north as a result of developments in Great Leighs and Braintree.
- Site 6 is unsustainable - the motivating factor for this site is the provision of another access road to the hospital. The road would not mitigate the increase in traffic that will be generated by the site.

- The parish of Little Waltham will be overwhelmed by these developments, the village will become a rat run, there will be no break between Broomfield and Little Waltham, Little Waltham will just become part of the urban sprawl of Chelmsford.
- Areas of good quality agricultural land will be lost, along with large areas of the countryside.
- The concentration of so much development in one area is not sound in itself. The necessary developments should be spread around the Chelmsford area and in particular should be located in areas that have better infrastructure, e.g. close to the A12, or A130 which are the main roads used by those in the area who commute by car.

## **5. Independent Examination**

Little Waltham Parish Council will want to be represented and be able to address the Inspector at the future public examination of the Local Plan.