

South Woodham Ferrers Town Council

Response to Stage 2 Masterplan Consultation for Site 10 – Land North of South Woodham Ferrers

Executive Summary

The Town Council is disappointed to see the continual increase in the number of houses being proposed for site 10. The initial consultation was for around a 1000, the second consultation increased this value to over 1180 homes and the initial Masterplan Stage 1 consultation indicated a maximum stress test for the site of 1500 homes.

We now read within the Masterplan, that 1500 homes are proposed on the application sites for both Countryside Properties and Bellway Homes which is now at the maximum of all stress tests and supporting evidence.

The Town Council will challenge any further increase and will call in to question, a lot of the supporting evidence that has been used to deliver a sustainable growth development.

The following subject areas contained within the Site 10 Masterplan are covered in this response to the consultation.

Road Infrastructure

The Town Council finds the plan lacking in a cohesive road transport plan that takes into account all the factors that are likely to cause ingress and egress traffic congestion through the Local Plan time period until 2036. The Masterplan is far too centred and focused on traffic getting in and out of the individual building site sectors within the new development site 10 rather than presenting an integrated view that is sustainable to this increasingly congested area of Essex. Lack of consultation with neighbouring Councils to the South of Chelmsford regarding this Masterplan also demonstrates apathy in the modelling scenarios that were used as evidence for the Local Plan.

Power Line Infrastructure

Not enough due-diligence, representation or engagement here from the relevant organisations. The Town Council wish to avoid re-development or further disruption to residents whilst the national grid power infrastructure is addressed. There is confirmation from Bradwell that any generating capacity would need a new connection to the national grid. This concern also carries forward to the mounting perceived evidence that living under or above high capacity power lines is not popular among residents and the

Masterplan has sports fields, a new primary school and a care home located very close to the current overhead power line route that bisects the Masterplan site.

Sports & Recreation Facilities

The Town Council is concerned that Chelmsford City Council has already not readily engaged with the Town Council have shown very little consultation evidence to the specific local needs of South Woodham Ferrers. We believe the new proposed sports recreational areas are being too heavily decided on Chelmsford-centric commercial service operations of the City Council and not based on local residential need.

Environmental Infrastructure

The Town Council believe there is a lot of conflicting evidence and references within the Masterplan where it contradicts the evidence presented to City Councillors who approved the Local Plan. We also believe that processes to acquire the necessary due-diligence and evidence were not followed where it was suspected that such evidence would harm the progression of the Local Plan. Lack of such process (when compared with other sites in the Local Plan) are likely to provide grounds for a judicial review.

Road Infrastructure

The Town Council's response to the consultation in regard to Road Infrastructure can be broken down into the following areas.

- 1) Site 10 Ingress & Egress and junction priority on the B1012 Burnham Road.
- 2) Average speed of through traffic creating new desired routeing
- 3) The number of surface-based crossing points to create an integrated community
- 4) The Ingress and Egress from the town through to county dispersal routes
- 5) The effect of new regional and national road infrastructure on the whole town's locality.

Site 10 Ingress & Egress junction Priority on to the B1012 Burnham Road and B1418 Bicknacre road

We note the following from the Masterplan.

The proposal to create three new junctions on the above-mentioned roads adding to the four roundabout junctions that are already present on this road.

The Town Council's concerns here are to do with the modelling and peak-hour priority flows of these junctions. Traffic models conducted in 2016 which formed part of the evidence base for the Local Plan are out-of-date to be used credibly as evidence of a sustainable throughput of peak traffic on the Burnham Road. The standard roundabout priority systems will give priority to traffic from the new development that will be detrimental to the current town's four access points through to the out-of-town road systems.

All modelling would require some form of peak time light control at the four current junctions to maintain the balance of access between through traffic, traffic from the existing town and traffic from new site 10. If there is no linkage here between the junctions, traffic flow at peak times will be a lot slower than that which could be achieved with the correct modelling and linking of control systems.

The Town Council does not support the view that the details should be decided and presented at the individual planning application stage. Planning applications will handle road junctions specifically individualised for each area a planning application is submitted within the application site and will not provide a cohesive and joined up model for traffic management within the town.

The Masterplan is the last stage of the process where a co-ordinated set of junction improvements can be presented. The Local Plan lacks the detail and indeed, the Local Plan consultation stated that the detail will come in the Master planning process. The Town Council does not believe the process adopted that readily shifts accurate modelling and co-ordinated designs further back to the planning application stage is a sound one for determining the needs of sustainable traffic priorities and flows for the proposed new junctions.

Average speed of through traffic creating new desired routing

The Town Council notes the proposal to reduce the speed of the B1012 to 40 MPH and also notes there will be 6 junctions on this 1.5 mile stretch of road between the Hamberts Road Roundabout (known as the Maldon roundabout being the furthest East on the plans) and the Shaw Farm Roundabout (being the furthest West on the plans)

Whereas the Town Council in general supports the 40 MPH speed limit on this stretch of road, the new proposals will create an increased number of 'start and stops' required to transverse the road. This will reduce acceleration and hence speed even further, especially of goods vehicles and heavy load lorries. Add the gradient-factor of the road and the inability of goods vehicles to either gain momentum on the incline and/or drive on-the-breaks during the decline, we believe the average speed of this road will reduce to 20 MPH outside the peak times, and 5 – 10 MPH during the peak. This in turns increases low gear, high engine revolutions in fully laden lorries and significantly increases resonating vibrations and noise pollution to the school and houses that border the road.

This analysis leads the Town Council to believe that a new preferred route issue will emerge, as it will be easier to cut through the existing town along the Ferrers Road between the two mentioned roundabouts. This route although longer, has the benefit of the through traffic receiving 66% of the priority routing through the town at each of the three roundabout junctions. Any well-meant junction improvements for turning left from the Ferrers Road onto the A132 to service the existing town will only improve the attractiveness of this new desired through-route.

The Town Council cannot support a site scheme which increases traffic through the current town causing a detrimental problem for our existing residents.

The number of surface-based crossing points to create an integrated community

We note the increased number of crossing points within the Masterplan located on the Burnham Road. The Town Council believes that with a 40 MPH limit, all crossing points will have to be controlled and this control, whilst needed for the safer crossing of the road, will add to congestion issues if the crossings and the controlled junction priorities are not deployed as an logical, co-ordinated system. If the average speed is slower, we believe more risk may be taken by people crossing the road 'ahead' of the control provided by lights.

The Town Council also believes that for the whole of Site 10, there is a significant issue with the desired route through to the William De Ferrers secondary school which will service the whole town. The Masterplan is very good at encouraging cycling and walking and the Town Council naturally supports these initiatives. We also believe that the desired route to the school for around 40% of the new site 10 will be via cycleways and paths that link through to Scholars Walk and the existing pedestrian and cycle underpass that crosses the railway

line. The remaining 30% will cross at the Hullbridge Road junction, 5% at Shaw Farm and 25% at the new junction servicing the eastern side of the site 10 development.

The Town Council is concerned that the early years of secondary school are the years where risk taking versus common sense are most demonstrable and crossing the Burnham Road at surface level with its increased traffic flows; car drivers in stop-start-accelerate driving habits all contribute to a belief that utilising surface based crossing points for all of the crossings, especially on the desired route to the secondary school is not a safe, resilient or sustainable approach.

The Town Council does not support bridges at any location due to the close proximity of houses and the privacy issues that are generated by footbridges. However, for the crossing point 4 (The existing bridleway) and crossing point 5 new junction North of Hamberts Road, the Town Council would possibly support underpasses provided they are wide, can accommodate mobility assistance users in icy weather, are not too long to create a crime black spot, are well lit, are 24/7 CCTV camera monitored and can be clearly demonstrated that they will not flood in heavy or even medium-fall rain. The Town Council will not support unsafe underpasses and will actively campaign against the building of and/or closure of any underpass that does not demonstrate safety and confidence with cyclists and pedestrians.

With underpasses at these two points, a safe non surface route to the secondary school is created that would also be the desired route for 65% of the secondary school age population residing on site 10. The Town Council would also support any action to remove the bridleway status of the crossing south of the Burnham Road as there is no need to maintain this ancient status across the road.

Until we see evidence of safety concerns being presented, the Town Council cannot support the development of Site 10.

[The Ingress and Egress from the town through to county dispersal routes](#)

The Town Council is concerned about the increased level of traffic being generated the regional area and the lack of anything in the Masterplan that deals with the wider Ingress and Egress regional traffic flows.

The Town Council notes the preferred route submitted by Maldon District Council and Essex County Council in response to the Initial Bradwell Consultation. This clearly states that Essex County Council and Maldon District Council are in agreement that strategic route 1 (The blue route) is the preferred option for the route from Bradwell to South Woodham Ferrers and the start of Site 10.

This option improves all the flows within the Maldon Council Boundary but moves the pinch point to Hamberts Road Roundabout and the subsequent flow through the new expanded town. The Town Council can see no evidence that this new flow of traffic has been correctly modelled or integrated with the Site 10 Development traffic flows.

The process that determined the new traffic responsibility was 'Bradwell's to solve' even though the Local Plan was unapproved when the information became available has clearly not delivered the required evidence base for Site 10. The Town Council therefore believes and concludes that process followed which lead to the approval and adoption of the Local Plan is no longer sound.

The Town Council believes that the current road infrastructure from The Hamberts Road Roundabout through to the Rettendon Turnpike interchange is unable to cope with the modest increased traffic flows originally forecasted in 2016. Indeed the 2016 survey clearly demonstrated that the roads would be over capacity by 2036 even without the Bradwell increase and expansion of the Maldon district council area as a series of dormitory-based housing sites. As such, the Town Council cannot support any development of Site 10 without seeing a cohesive transport model carried out and agreed that addresses all concerns regarding proposed traffic flows and the handling of peak time traffic.

The Town Council believes that the fundamental modelling and forecasting that has been carried out is too Chelmsford City centric. Whereas the models for the City of Chelmsford and its contiguous parishes were very comprehensively created and fully support the evidence base for the Sites within Chelmsford City and the contiguous Parishes, this level of detail was clearly missing in any of the impact assessments and evidence base for the Site 10 at South Woodham Ferrers, especially as site 10 was the second largest site area and a strategic growth site. The email communication was that this would all be addressed at the Masterplan stage. As such, the process by which the Local Plan was presented for adoption, and the subsequent Masterplan failing to present the level of detail required for road infrastructure in the immediate areas surrounding Site 10, is clearly no longer sound.

The traffic flows of South Woodham Ferrers significantly differ from those of the Central Chelmsford conurbations. Being a dormitory town, with very little local employment and very little new employment offered by the Masterplan, our peak traffic hours are earlier in the morning and later in the afternoon than the central Chelmsford area and parishes. Our primary flows are to Chelmsford, Basildon, Southend and the A13/A12 routes to the M25. Very little joined up thinking has been carried out with the neighbouring boroughs to the south of Chelmsford when compared to the evidence based presented in conjunction with the neighbouring boroughs for the northern semi-sphere around Chelmsford. The Town Council was led to believe that the required detail would be available as supporting evidence at the Masterplan stage for site 10. We see no examples or evidence of this due-diligence on spatial traffic flows for South Woodham Ferrers and the surrounding southern semi-sphere boroughs contained within the Masterplan so we now find the process followed to produce and secure adoption of the Chelmsford Local Plan , and the Masterplan derived from it, is no longer sound. The Town Council cannot support the Site 10 Masterplan until the required level of due diligence has been completed and presented as part of the Masterplan process.

The effect of new regional and national road infrastructure on the whole town's locality

As much as the Chelmsford City Local Plan, and the Masterplan derived from it, concentrate on the immediate area surrounding Site 10, The Town Council believes the unique position of South Woodham Ferrers relative to the county's main trunk routes will create significant increased road dispersal problems for its residents.

The Town Council is fully aware that 'junction improvements' within the Town Parish may provide some minimal benefit to very local, school-run level traffic issues. The Town Council believes that such schemes will just push the peak time queues further along the road to the Rettendon Turnpike junction and beyond.

The dispersal at Rettendon Turnpike is primarily going to be the A130 as the other route out through Wickford and the Nevendon Road is already heavily congested with Wickford and Runwell traffic.

The Town Council does not believe any proposed improvements at Rettendon Turnpike will reduce peak traffic congestion, but moreover, just continue to push congestion further to the A130 pinch points, being the A12 / A130 junction and the A127/ A130 junction. The Town Council cannot support development of a site that will both increase and push the peak congestion for 80% of our car-based residents further along the road, especially as we can now clearly demonstrate that the A130 will see significant traffic flow increases based on the following.

- a) The new Lower Thames Crossing will create a new desire route for A12 traffic from North Chelmsford and beyond through into Kent and Europe. Faced with the option of crossing northbound under the Thames, veering to the left for a few miles, joining the M25 for another few miles before exiting on the A12 and going eastbound to Boreham and beyond, the preferred route will be to turn left from the Lower Thames Crossing, follow the A13 round to the A130 and A12 (as this avoids the M25 and the low priority for right turn off the M25 onto the A12)
- b) The new north Chelmsford link road will extend this desire route even further as when it is completed, it will create a new desire route from Braintree and beyond through to Kent again using the A130/A13 route and the Lower Thames Crossing. The current desire route from Braintree and north of Braintree is to turn right on the A120 to Stansted, travel down on the M11, then the M25, and then the M2/M20 Eastbound. The new desire route will be straight down the new link road and pick up the A130 / A13 to the Lower Thames Crossing.

Indeed, it can be demonstrated that you probably have to go as far North and West as Bury St Edmonds before the desire route to cross the Thames becomes neutral again (i.e. A11, M11, M25, Dartford Crossing). Even Traffic from Norwich which traditionally goes through Thetford on the A11 and follows the M11/M25 will be

offered a better desire route to cross the Thames at the lower Thames Crossing using the A13/A130/A12 link.

These two new significant infrastructure projects (Lower Thames Crossing and North Chelmsford Link road) put tremendous additional strain on the A130/A12 junction (at Howe Green), the ability to ingress at egress at the Turnpike and the A127/A130 junction.

The A12/A130 (Howe Green) junction is totally inadequate to handle this capacity. Of the 15 Ingress and Egress paths available at this junction, 12 of these paths pass through the same single-direction, light-controlled system making it one of the worst designed junctions ever created for the joining of what are and will be two major trunk routes.

The A127/A130 junction is also a classic demonstration of poorly connected priority systems and even an extra exit route directly linking the A127 eastbound to the A130 Northbound will make this route become the preferred route for traffic that may still currently travel through Wickford to the Turnpike, so any benefit will just be taken up with increased traffic.

Road Infrastructure Conclusion

All of these changes coming and proposed, directly create a disproportionality higher peak congestion flow for the residents of South Woodham Ferrers Residents using the road system and as such, until the modelling is complete and proven and a satisfactory road infrastructure is proposed, the Town Council cannot support the Masterplan for Site 10.

The Town Council believes as the Masterplan does not contain the promised level of detail, and therefore that the process followed for obtaining the due-diligence and the evidence base presented to gain sign off of the Chelmsford City Local Plan is no longer sound. Any local re-painting of white lines or widening of junctions within the town are quite insignificant when the whole peak traffic flow to, through and from South Woodham Ferrers is considered.

Power Line Infrastructure

We note from the Bradwell Consultation that a new connection to the National Grid will be required. The Town Council concerns break down into two areas.

- 1) The timelines for any changes requiring significant work to the power cable infrastructure passing through Site 10 and the level of public engagement.
- 2) The effects of living near power lines and the understanding that science has moved on from that used when most of the existing National Grid overhead capacity infrastructure through site 10 was originally deployed.

Timeline for changes

The Town Council has concerns that the timelines for any changes to the power cables on Site 10 may come during the lifetime of the Local Plan and even when part of the new site may be starting to accept residents. The Town Council believes action can be take sooner and the pertinent decisions made to minimise any subsequent disruption to existing and new residents.

Bradwell have confirmed that a new connection to the national grid is necessary. The total GW generating capacity for Bradwell is 2.2GW. Based on that information, we believe one of the following scenarios is true.

- a) A new overhead connection is provided following a similar route to the current one. In this scenario the whole layout of Site 10 would need changing and that would be unacceptable at Neighbourhood and Local Plan level.
- b) If a new overhead connection is provided that routes around South Woodham Ferrers, then the Town Council would prefer the existing path through the town parish to also be re-routed away from the residential areas. This would not be an excessive cost if it was carried out at the same time as the new path.
- c) A new overhead connection could actually follow a shorter route crossing under the Blackwater and joining the grid infrastructure further along towards Colchester. The National Grid should already know if this is feasible based on the dispersal of power and whether this new connection could handle the whole generating capacity. In this case, the power lines through Site 10 could be removed. We understand that the cables have been used for 'load-balancing' but such balancing could easily be achieved elsewhere.
- d) The 2.2 GW electricity cable is a standard delivery size now and technology and building costs are much more understood. A grid connection could be run as an underseas cable straight down the coast to the Thames estuary and connected to the plethora of cables that existing in this area. In this scenario, the current capacity through Site 10 could also be removed.
- e) A second overhead connection could be provided on a totally different route, and power distribution balanced between the existing connection and the new connection. In this scenario, any structural changes required to bring the cables

through Site 10 into service would already be known and this work could be undertaken before any site development commences. In this scenario we would still ask that the money be made available from the Bradwell project to route the South Woodham Ferrers part of the cable route away from the town and Site 10.

- f) The existing route is upgraded to handle the full capacity of Bradwell. If this is the case, this will be already be known, and both work can start on the Site 10 section and if the work is significant and involves new cables we would also ask for a re-routing of the route away from Site 10 as these costs are more readily absorbed if party of a larger infrastructure upgrade.

The Town Council cannot support Site 10 as a development site without clarity in this area (which from above, we have determined could be provided, even before the Power Station gets the decision to go ahead). We do not want a situation where secondary works occur at the site once the site starts development and/or residents have moved in.

The Effects of Living near power lines

The Town Council has concerns that the proposed area for a primary school, care home, and community centre are situated close to the power line route. In this information enabled world we have concerns that 'residential opinion' could cause revolt and may prevent these facilities being adopted by our new and existing residents.

We are fully aware as a Town Council there are arguments that both claim and counter claim the effect on health of living near or under high power wires are numerous and no official medically respected paper has provided a conclusive answer that there is a significant health risk. However, our concerns are not about the medical science but about a community's perception of it and where perception becomes reality, the problem exists to be solved irrespective of any medical conclusion.

It only needs one child leukaemia case to trigger a trend or one parent to say I am not sending my child to school there, or one allotment tenant to say I am not eating vegetables grown under that and the problem, by default, exists. There are articles that claim living within 600m of such lines can have an effect, but again nothing medically proven.

As such, the Town Council cannot support a development of Site 10 that sits under and near such power lines when they are in active service (and Nuclear power, in its role to provide base line power will be generating at capacity for 100% of the time in most cases). Especially and beyond, the Town Council cannot support the location of services for children and the elderly that are located in very close proximity to national grid overhead power lines.

Sports & Recreation Facilities

The Town Council has concerns that the areas of the Site 10 designated for sports and recreation do not have enough detail or longevity associated with them.

The main sports area shown on site 10 has no provision as to what sports will be serviced. Ask any sports club 'do they want better facilities?', they will always say yes.

The Town Council cannot support a Masterplan that does not demonstrate public need of sports facilities. The Chelmsford Playing Pitch and Outdoor Sports Strategy and Action Plan 2016 – 2036 goes some way to identifying need for the Chelmsford district. However, South Woodham Ferrers and Site 10 is too far away from the central provision for the benefits offered within the document to be realised.

There was a lack of community engagement regarding the use of the sports fields and community spaces. We would encourage Countryside and Chelmsford City Council to work in partnership with the Town Council with regard to the individual sports and recreational use of the allocated sites. The Town Council believes it is closer to recognising the needs of the town's residents. On this note, the Town Council would be pleased to liaise with the City Council to determine the best use of the recreation allocations. The Town Council cannot support the development of site 10 without more detail being agreed and supplied as part of the Masterplan.

Environmental Infrastructure

The Town Council has concerns about several aspects of the Master Plan that have come to light, and not least of these is the Environmental impact it will have on the area.

South Woodham Ferrers and the surrounding area are environmentally sensitive, evidenced by the fact that we are near “the Crouch and Roach Estuaries Special Protection Areas, RAMSAR sites, and SSSI’s (Sites of Special Scientific Interest)”. This is a direct quote from the Chelmsford City Council Local Plan, Full Council Edition, May 2020, page 173, paragraph 7.337. This gives the area protection under both National and International Law.

The Town Council examined the E.I.A. Scoping Report commissioned by Countryside Properties and issued in February 2020, and some concerns and contradictions were evident. We put our concerns to the developers, and we have given a summary below of the questions we asked and the replies we have just received.

Landslides and Natural Subsidence

- The E.I.A. says on page 10 – The application site has undulating topography, with some gradients steeper than 1:15. It states that there is a moderate to high risk of landslides occurring on site that have been identified locally in the East and North of the Application Site. The British Geological Survey says the maximum hazard rating of natural subsidence, within the Application boundary is HIGH.

The Town Council asked what is being done to avoid landslides and subsidence. We were told that Countryside would not develop on the steepest areas, and that a geo-technical investigation desk study noted that there were small scale ground movement and landslip observed on the periphery of the development land. They added that they would decide whether further monitoring was required during further ground investigations.

The Town Council cannot support the development at any locations within the Masterplan site 10 where the risk of natural subsidence is HIGH.

Surface Water Drainage and Flooding

- The E.I.A. says on page 11 – The proposed development could significantly change the surface water drainage on the Application Site, including increasing the extent of impermeable areas.

The Town Council expressed their concerns as the area of Burnham Road/Hullbridge Road that borders the development site that already floods every year in periods of heavy rain, as does the area in the Old Wickford Road, that has a creek at the end of it.

Countryside replied that their proposed drainage strategy would mimic the natural drainage regime for the existing area. There would be numerous swales which would redirect the existing overland flows into the existing watercourses at the same rate as natural flows in

the developed sites the drainage strategy would be designed during the detailed design stage, but would, where the positive drainage system is exceeded be directed to detention basins. It would remain there until it could be discharged into the brook.

There is still a question as to how this would prevent a detrimental effect to the flooding issue that already occurs in the area surrounding the site, when reading the E.I.A. report that states that the development will increase the extent of impermeable areas.

The Town Council cannot support development at Site 10 until a full survey that covers the implications of the extended impermeable areas as provided in the E.I.A are suitably addressed. Due to the nature and inconsistencies here at this stage of the total planning process, the Town Council would like to see a comprehensive and totally independent full review carried out of the relief drainage and flood prevention mechanisms and designs being proposed across the whole application site of 1500 homes and all the public service and utility buildings.

Water Capacity and Sewerage

- The E.I.A. says on page 54 – The Application Site is currently undeveloped and therefore no water is being utilized. **There will be a substantial increase in volume of water required and commensurate wastewater generated by the proposed development.**

A single surface water sewer is present on the Application site. The surface water discharges into the watercourse beneath the unnamed ordinary watercourse B1418 in culvert. **Two surface water sewers are present in the B1012 Burnham Road, and are at A LOWER ELEVATION to the majority of the Application Site, as is the foul sewer adjacent to the Burnham Road.**

The Town Council were concerned about the capacity of the existing water and sewerage systems to cope, with the 1,500 homes we are now expecting (a 50% increase on the figure quoted in the newly adopted Local Plan), and the safety of our residents should there be issues with fresh water supplies and possible sewage overflows.

The reply from Countryside said that “There is expected to be sufficient water capacity to cater for the development. However, discussions are ongoing with Anglian Water with regards to any improvements that may be required within the network, and they are carrying out a capacity assessment to fully understand the existing capacity and any improvements that may be required”

This does not allay our concerns regarding the views expressed by the E.I.A., and we would hope that this issue is definitely determined before any Planning Application is sent in. We feel as a Town Council that the welfare of our residents and the environmental issues of the proposed S.G.S. 10 must be addressed. We also note that Countryside are liaising with Anglian Water who process the sewerage for South Woodham Ferrers and not with Essex Water who supply the mains water service.

As with surface water drainage, The Town Council cannot support development at Site 10 until a full survey that covers the implications of the extended impermeable areas as provided in the E.I.A are suitably addressed. Due to the nature and inconsistencies here at this stage of the total planning process, the Town Council would like to see a comprehensive and totally independent full review carried out of the relief drainage and flood prevention mechanisms and designs being proposed across the whole application site of 1500 homes and all the public service and utility buildings.

End of Submission.