



SOUTH WOODHAM FERRERS TOWN COUNCIL

Please find below the comments on behalf of South Woodham Ferrers Town Council with regard to the Hybrid Planning Application 21/01961/OUT : Oaklands Meadow

Throughout this document the following abbreviations will be used:

The Council = South Woodham Ferrers

CCC = Chelmsford City Council

ECC = Essex County Council

As outlined in the South Woodham Ferrers Neighbourhood Plan the Council recognises and supports the growth of our town, we recognise future development as 'an exciting new chapter' in our towns development. We accept that there is both a demand for new housing and that new housing needs to be shared out across local communities, and that South Woodham is one of those communities but the new development must be sustainable without detrimental affects to the existing town.

Our Neighbourhood Plan, approved by referendum in November 2021, also sets need for housing and supports the main objectives of this planning application. Our residents told us that 'future growth to the north of the town should be 'well-linked to the existing built-up area, improving connections across Burnham Road' to achieve our vision of becoming a 'complete community' and sustainable.

[Executive Summary](#)

The Council believe that aspects of this planning application for Oakland Meadows contravenes the "Vision for Chelmsford" and the following Local Plan Policies -

Strategic Policy S10 -Securing Infrastructure and Impact Mitigation

Policy DM18 – Flooding/Suds

Policy DM29 – Protecting Living and Working Environments "Development must also avoid unacceptable levels of polluting emissions, unless appropriate mitigation measures can be put in place."

This application contravenes NPPF 2021, Paragraph 110 " safe and suitable access to the site achieved for all users", Paragraph 111 "Development should only be prevented or refused on highway safety, or the residual cumulative impacts on the road network would be severe, Paragraph 126 "Good design is a

key aspect of sustainable development....creates better plans in which to live and work and helps make development acceptable to communities”, Paragraph 159 “Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.” & Paragraph 160 “Strategic policies should be informed by a strategic flood risk assessment, and should manage flood risk from all sources. They should consider cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as lead local flood authorities and internal drainage boards.” In addition there appears to be some aspects of data collection that are incomplete, not relevant to SWF & appear to be rushed in compilation.

The Council would recommend that this planning application is refused due to the major highways and drainage concerns. Whilst the Council has detailed their objection and the material planning considerations that would recommend refusal, the final section of the document details comments from Focus groups of other areas of concern.

With regard to the Outline parts of the application THE COUNCIL would like their concerns, questions and comments to be considered before submission of the full application for these areas of the Oakland Meadows development. Some aspects of data collection are dated, not relevant to SWF & appear to be rushed in compilation. Cumulative impacts on the road network have not really been examined and therefore the Transport Assessment is deficient.

There are concerns that the supporting document submitted with the application are out of date, incomplete, and not relevant to South Woodham Ferrers and despite early engagement with the developer concerns raised by Council and residents do not appear to have been mitigated within the application resulting in what is considered by Council a non-sustainable new development, for this reason and material planning applications listed below the Council **OBJECT** to this planning application.

The Council feel that many aspects of this application contravene the “Vision for Chelmsford”, three of CCC Local Plan policies Strategic Policy S10 – Securing Infrastructure and Impact Mitigation, Policy DM18 – Flooding / SUDS DM29 – Protecting Living and Working Environments and the National Planning Policy Framework.

Material Planning Considerations Concerns:

Highway Concerns:

The traffic documents supplied by the applicant contains several inaccuracies, poor references, invalid data sets, and traffic surveys carried out 5 years ago. The theoretical schemes have no bearing on the local reality of traffic flow using the current infrastructure and how this would be affected by the road schemes proposed in this application. As, such we do not feel these documents are valid or contain valid data sets , local awareness modelling or understanding of local

traffic flows, without up to date data the Council are limited in their response. This is enforced by the extension requested from Essex County Council Highways on the application stating that "there are local traffic issues, and they request more time to comment"

Areas of significant concern:

- 1) Junction 27 – new junction on Proposed Illustrative Layout, drawing 301 revision B / Junction G on Proposed Parameters plan Access and movement , Drawing 324 Revision B

The new junction G / Junction 27 (new junction on Proposed Illustrative Layout, drawing 301 revision B / Junction G on Proposed Parameters plan Access and movement , Drawing 324 Revision B), will cause significant problems for the residents of the proposed 130 dwellings that will use it. This junction has no right turn for both its ingress and egress access. For residents wishing to turn right and head towards Bicknacre on the B1418, they will be forced to turn left and travel to the B1012/B1418 light-controlled junction. They then have the choice of turning left or right and proceed to the next roundabout (being either the Hullbridge Road Roundabout, or the Ferrers Road/Willow Grove Roundabout) before being able to reverse their direction, head back through the traffic light junction before being able to commence their journey. We believe residents will take the path of least resistance and the desire route will be to head straight across at the traffic lights and then perform a U-turn in the Old Wickford Road before heading back. This design is unacceptable due to the impact on residents of the new development area and the residents of Old Wickford Road. This activity may also skew the junction timings of the light-controlled junction and reduce the traffic flow of the Burnham Road since the activity will trigger more requests to the lights to switch direction. The problem has been compounded by the late change of design that has converted the B1012/B1418 junction from a roundabout to a light controlled junction.

- 2) Rat runs that may emerge because of the new proposed road layouts, junction alterations and the increase in light controlled pedestrian crossings.
 - i) Traffic heading through South Woodham Ferrers from the Dengie,(and traffic from the eastern end of the Town who exit on the Ferrers Road at its eastern end, could cut through the new development if they are heading onto the Bicknacre road (which is a major alternative route to Chelmsford and the A12). This will become the desire route as it avoids the Hullbridge Road junction and the traffic light junction.
 - ii) Traffic heading into South Woodham Ferrers from the Dengie will use the Ferrers Road right through the existing Town before re-joining the main through-road at the BP/Shaw Farm Roundabout on the Western side of the development). This alternative route, although longer by some 400 metres, will have a better through-route priority,

less complicated and pinch point junctions to navigate, fewer potential light-controlled pedestrian crossings and a flatter road system. This then runs the risk of causing more than necessary congestion and road safety issues for existing road users, including cyclists and pedestrians in our Town.

- iii) In addition to the above, a third cut through, using Hamberts Road and King Edwards Road is also envisaged as traffic will avoid using the Burnham Road to the Hullbridge road junction with its extra light-controlled crossings, gradient based slow acceleration of HGV's and extra junctions in-between. This cut through is already used more frequently since the opening of the Hullbridge road roundabout junction which already has increased peak time queuing on the Burnham Road. Again, this has not been assessed in the plans provided despite the impact the Development would potentially have on them.
- 3) The application does not appear to consider the impact of the development on other routes in South Woodham Ferrers especially the impact of vehicles from B1012 Woodham Road from the Dengie and diverting along Ferrers Road. There is a large new development within North Fambridge which highlights South Woodham schools and shops as their near by services, this new development has not been considered within the traffic modelling of the B1012.
- 4) Concerns that congestion caused by the significant points of interest on B1012 such as the new superstore, the railway station and the new development that traffic from the Dengie could use the Ferrers Road as the preferred route through the Town. This road is 40mph with a frequently used pedestrian crossing to access the local secondary school and Asda supermarket. Members would welcome signage to direct traffic along the B1012 and the upgrading of the zebra crossing to a light-controlled crossing which as stated in the Essex Highways Local Highways Panel Members Guide would be more suitable for a road with traffic in excess of 35mph.
- 5) The application heavily relies upon non car movements and the introduction of a bus strategy. Members do not feel that this will mitigate the travel concerns, the current 36 bus takes 55 minutes to travel to Chelmsford from South Woodham Ferrers, the Oaklands Meadow application is regularly compared to successful schemes at St Lukes, Runwell and Beaulieu Park which bus routes to local facilities are 5 – 15 minutes from the development. South Woodham cannot be compared to these areas, the nearest town is Chelmsford which is a 55 minute bus ride. It is believed that the type of properties that the development is being targeted at will be commuter journeys and residents will not travel 55 minutes to get to Chelmsford.

The Council cannot support a planning application that significantly relies on a bus strategy and car sharing as mitigation to alleviate highway issues which could be caused by the proposed development.

Drainage Concerns:

Strategic Water Attenuation

Drainage Strategy 22/9/2021 AECOM Ltd

General level of competence

- 1/ The Council has serious concerns about the drainage strategy. The current solution is not credible which is evident due to many parts of the application being vague in the area of drainage. A capture-all ethos inferred throughout the submissions that 'SuDS will solve everything'. A theoretical SuDS based on figures and not on the reality of the local environment and the increasing flooding occurrences within recent years as a result of climate change. In addition, this strategy takes little account of the whole masterplan and Local plan areas, with areas outside the application boundary, but within the Masterplan boundary being the most at risk of flooding.

Anglian Water Consultee Comments on CCC planning application 21/01961 /OUT states *"The proposed method of surface water management does not relate to Anglian Water operated assets and as such we are unable to provide comments on suitability of the surface water management."* Anglian Water go on to state *"Next steps-Desktop analysis has suggested that the proposed development will lead to an unacceptable risk of flooding downstream."* and advises *"consultation with us in a feasible drainage strategy"*. We agree with this and would require reassurance that these points are fully addressed in any Full application.

Out-dated metrics

The application and supporting documents quotes of a 1 in 100 storm event, which is a notion that is over 50 years old and does not taken into account the current climate change implications, see evidence below. The data points used in forming the benchmark of what constitutes a 1 in 100 year event (and subsequently used to design the whole drainage strategy) is missing from this application and effectively invalidates the whole application in the area of drainage.

Countryside have consulted with Lead Local Flood Authority, Essex County Council and the proposed SuDS conform to existing legislation:

Paragraph 2.1. The " SuDS drainage solutions will be designed in accordance with Essex Sustainable Drainage Design Guide and CIRIA C753 SuDS Manual 2015.

Paragraph 6.1.1 allows for climate change for the "1 in 100 year storm event" or 1% risk of a severe storm event in any one calendar year.

31 extreme weather events hit the UK between 2018-2020, higher than the 29 recorded over 2008-2017" (<https://www.actuarialpost.co.uk/article/exterme-weather-events-in-last-3-years-more-than-last-decade-19207.htm>) and "Serious floods..... which used to occur every 100 years are now occurring between every 10 to 20 years". (<https://ypte.org.uk/factsheets/climate-change/global-wetting-more-like#>) This reinforces the concerns raised by Councillors and residents with regard to flooding concerns and the proposed mitigation.

Incomplete drainage assessments (Eastern end of the proposed development)

The Council believes there has been inadequate research and conclusive assessments carried out on the drainage strategy on the eastern development area of the site. This area already experiences excessive fluvial flooding whenever the land is saturated, resulting in flooding on the Burnham Road. The drainage strategy details that "SuDs solves all" approach will work. Local knowledge identifies that water from these areas drains under the railway track through into the Saltcoats recreational area and into the borrow dykes surrounding the sea wall.

Page 11 3.3 Hydrology-There is a short reference to the existing ditch between the Garden of Remembrance and the southern parcel although omits to examining the condition and suitability of this ditch. It was confirmed that further investigation were required by AECOM in a meeting with THE COUNCIL on 8th December 2021. This ditch is proposed to be the main drainage for surface water for the eastern part of the development. This must be further investigated before any building work commences.

The Council has severe concerns regarding the possible impact of surface water flooding on other areas of the town due to the new development.

Strategic Foul Drainage

Environmental statement Volume 3 Non-technical summary

Page 52 refers to water sampling of Fen Brook during the construction phase, although does not detail how and the frequency. The Council feels that to ascertain the effect of the whole development there should be a programme of regular water sampling for a number of years, both during the construction phase and after completion of the development. If planning is granted a planning condition stating this would be welcomed.

Drainage Strategy 22/9/2021 AECOM Ltd

The Council has severe concerns regarding the Foul Water Drainage from the proposed development. Paragraph 3.6.2, makes no mention of the

main sewer that runs through Redhills Industrial Estate, back gardens of residents in Glendale who back on the Old SWF/Maldon railway line and Eastbridge Road. This sewer has collapsed within the last 4 years. Also see Foul Water Diagram in Appendix C. The Council has concerns whether the developers are aware of this sewer as it is not detailed on the Foul Water Diagram, if not then further investigation are required to ascertain where it drains to and the effect on its capacity with any proposed new development.

Consultation Responses Paragraph 4.4.1 identifies Consultation Process- Anglian Water – “SWF Water Recycling Centre which currently does not have capacity to treat the flows from your development site” this is reiterated in Anglian Waters consultation comments on CCC planning application. The Council has concerns that if Anglian Water has to extend the Water Recycling Centre in SWF, what the implications would be for the John Cox site land owned by South Woodham Ferrers Town Council which is a popular open space for dog walking and recreation.

Page 7 of the **Foul Water Drainage Strategy Table**, states “Anglian Water are reviewing the capacity.....to aid the potential capacity issues of the western network”. The Council has concerns about redirecting 140 existing homes, so as to alleviate this shortfall of capacity, to the eastern network and the potential risk to the eastern network capacity?

The two existing pumping stations, at Ferrers Road (Permit No: AW2TSE02080) that discharges into Fenn Creek and at Clements Green Lane (Permit No: AW2NFE06175) that discharges into a tributary of the River Crouch. The Rivers Trust states that “These are sewer storm overflows and emergency overflows that do not currently have monitoring equipment installed, without this monitoring so we do not know how frequently they are discharging untreated sewage into our rivers.” How will the new development impact on these and will there be an increased risk of untreated sewerage entering the Crouch Estuary?

The final paragraph of Section 7 Foul Water Drainage Strategy states “ From latest conversations with Anglian Water it is assumed there is sufficient capacity in the existing foul runs to accommodate the proposed development.....a capacity is being undertaken by Anglian Water to confirm this.” The Council is concerned that as of Sept 2021 this is assumed not confirmed. There are concerns how the instigation of the “management company” detailed in section 8 will impact the existing residents if Anglian Water do not adopt the pipework. The Council has concerns with mixed ownership and would require confirmation of who will adopt this pipe network

Wildlife & Habitat

The Council has concerns regarding the impact of the development on wildlife and habitat as a result of the development, the points are highlighted below within the appropriate document:

Environmental statement Volume 3 Non technical summary

Page 32 this section is inconclusive, is there or is there not potential archaeological asset damage?

Page 33 7.21 Will carbon reduction be based on 2022 or 2025 requirements?

Page 33 7.28 and 7.29 LoWS will be impacted by disturbance, light, noise, domestic cats and people (also 7.66 later).

Page 47 When dealing with the effects of the development on mammals there is no mention of hedgehogs, a species at greater risk with a decline of 50%.

Page 49 A lot of information on the effect of the development on birds but nothing on the main habitat loss of farmland. Birds effected on the proposed site include red data species such as skylarks, linnets, corn bunting, yellow wagtail which are already recording a 50% drop in numbers in the UK.

Appendix 9.1 Extended Habitat Survey 20/4/2017 & Appendix 9.2 Extended Habitat Survey 28/4/2017-

As the title of this document shows this a five years out of date and it specifically states that it is only valid until October 2018.

1.2.10 Recognises farmland species of conservation interest, farmland being the main habitat lost in this development, but fails to provide a comprehensive list of these species. Also there is no mention of the mitigation required for this loss.

1.4 Tawny owl an amber list species is not mentioned in the mitigation requirements.

4.2.1 It is good to see that Essex Field Club data search was used in the survey.

4.4 and 4.5.1 The results of the survey are devalued as only a single daytime survey was done and that was OUTSIDE the recommended survey period.

5 Results: baseline ecological conditions.

The following bird species of conservation concern were missing

Turtle dove RED DATA Song thrush RED DATA Corn bunting RED DATA

Stock dove AMBER DATA Tawny owl AMBER DATA Bullfinch AMBER DATA

General summary of this document. It is felt that further up to date, time specific and thorough surveys are required

Design

Page 122 Mitigation is required in respect of potential degrading of Edwins Hall Wood due to human access, predation of breeding birds by household cats and general disturbance

Page 124 Similar to Page 122 above mitigation required regarding potential damage to Local Wildlife site, trees with tree preservation orders etc

Sustainability and Energy Statement

Page 9 Regarding EV points. The government is currently updating the provision requirements and this section needs to be updated to reflect this
Page 25 3.8.1 Ecology The loss of arable farmland is not given proper emphasis and seems to be overlooked.

Species present on site and which will be affected are:

- Red data species
- Turtle dove Skylark Starling Song thrush Yellow wagtail Linnet Yellowhammer Corn bunting
- House sparrow Swift House martin
- Amber data species
- Stock dove Tawny owl Meadow pipit Bullfinch

In current development plans there is no compensating farmland habitat. There is mention here and elsewhere about the importance of habitat connectivity for badgers but nothing for hedgehogs that are at greater risk from human activity.

Appendix 9.21 Preliminary Ecological Appraisal of Proposed Cycle Path – Geosphere Environmental –

Unfortunately the appraisal is very poor regarding species data, although an extended habitat survey was completed in June 2021 where are the records of the warblers that can be heard singing on site? There is also no mention in the appraisal of nocturnal species such as tawny and long-eared owl together with hedgehogs to mention just a few. The major failing with this survey is the fact that the data used is the Essex Wildlife Trust Biological Records Centre's and Geosphere Environmental's own Bat, Badger, Reptile and Great Crested Newt reports (there is no indication that they are relevant here). It does not use the Essex Record Centre Service which is recognised widely as the main source of species records for the County. The Essex Record Centre works in partnership with Buglife, Butterfly Conservation, Essex Amphibian and Reptile Group, Essex Bat Group, Essex Birdwatching Society and GeoEssex all recognised experts in their chosen fields. Much if not all of Essex Record Centre Service's data is not on the Essex Wildlife Trust Biological Records Centre. A more thorough survey on Wildlife & Bird should be conducted as the site could not be accessed when the report was written.

Focus Group Comments

The comments below have been collated by Focus groups of subject areas, the main points from the below have been highlighted above although there are additional comments below with regard to habitat and air quality.

Highways

Transport Assessment Mayer Brown October 2021

3.17 why is just 5 years of road safety data used and THE COUNCIL would advise consulting with a road safety expert. Crashmap data shows there have been around 60 KSIs since 2010 on the Burnham Road from Shaw Farm to Hamberts Road. <https://www.crashmap.co.uk/Search>, yet the Transport Assessment refers to 'one fatality' and 'some slight/serious accidents' and concludes there is no 'accident blackspot', but fails to define what that is. There have been 12 accidents at Shaw

Farm roundabout in the past 10 years. It says these plans have been subject to a Stage 1 Safety Audit and a review against LTN 1/20 but that does not seem to be included in the report.

3.21 The Transport Assessment explains that, as a result of the modelling undertaken, there are three key junctions that would require capacity enhancements in order to mitigate the impacts of development. However Table 8.2 states 2 junctions require "modal assessments" and Table 7.7 show 6 junctions require mitigation. THE COUNCIL have concerns regarding the seeming discrepancy with regard to how many junctions actually require mitigation. Chelmsford Local Plan May 2020 states : "Capacity improvements to the A132 between the Rettendon Turnpike and South Woodham Ferrers, including necessary junction improvements to be brought forward as early as possible in tandem with the delivery of development to mitigate its impact.". THE COUNCIL would like to enquire when is this 'early as possible', has ECC committed to this, what if refused or delayed and is this a condition on development? THE COUNCIL would like to raise concerns that many of the mitigation strategies require residents to implement non-car use. Whilst the walking and cycling strategies meet Government & local authority requirements for sustainable travel, in reality the lack of retail amenities & regular public transport and the location of SWF as a rural town and a largely commuter town means that car ownership is unlikely to reduce. And despite the Bus Strategy stated in paragraph 6.25.

4.8 to 4.19 describes the 6 proposed crossings across the B1012. The proposed speed limit will be 40mph, is this a safe limit for the number of crossings proposed? World Health Organisation (WHO) says "*A safe speed on roads with possible conflicts between cars and pedestrians, cyclists or other vulnerable road users is 30 km/h (20mph)*". THE COUNCIL would like to suggest reducing the

speed limit to 30mph along the Burnham Road and Ferrers Road to make the speed limit consistent throughout the town and for safety of all road users.

THE COUNCIL are concerned of the impact of the possible Bradwell B and especially in Section 8.3 it is stated "The Bradwell B consultation report states it is anticipated that they will be able to use SWF ring road (the existing B1012) for 500-700 2-way HGV movements per day for 8 years of the build" & 8.4 In that context the additional flows have been added to the models contained in Section 7 as shown in Table 8.1. It is noted that the promoters of the Bradwell B scheme, are likely to have to demonstrate measures to "RESTRICT OTHER MOVEMENTS BY PRIVATE CAR DURING THE CONSTRUCTION PERIOD." Especially as the developers were asked by David Green (Director of Sustainable Communities) to include the potential effects Bradwell B would have on our area. They supposedly checked out the impact with Cumulative Assessment calculations, and seemingly came to the conclusion that 500-700 HGVs travelling up the B1012 for 8 years, would have a negligible effect. The answer to everything seems to be to implement a non-car regime.

9.8 & 9.9 relating to "Free Bus Travel" state "it is proposed to provide all residents with up free initial bus travel when the bus service is implemented". THE COUNCIL would welcome this initiative for all residents of South Woodham Ferrers to use public transport.

Section 9.13 explains the proposed cycle improvements within SWF. THE COUNCIL would welcome further investment in reducing dependency on car use by introducing a dedicated cycle route to the network to/from Chelmsford, Wickford and Maldon. THE COUNCIL has questions which include, "The upgrades to existing cycle network including the rail station but how? Hullbridge Road very narrow, where is space for a dedicated cycle path that is needed without conflicting with vehicular traffic? Signage and lighting ineffective. Difficult to see how traffic and cycles will be segregated safely particularly at entrance and approach to rail station. Any consultation with Network Rail?"

9.21 THE COUNCIL would welcome the "Better Points Scheme" as incentive to encourage sustainable travel for all SWF residents.

9.27 to 9.3 THE COUNCIL would welcome the "Smarter Choices Campaign" for all SWF residents.

Draft Residential Travel Plan October 2021 Mayer Brown

Section 8 -THE COUNCIL would welcome to a Travel Plan Coordinator FTE role and their responsibilities to promote and monitor Personalised Travel Plans for all SWF Residents.

Appendix 6.1 Air Quality Assessment, May 2021 – Mayer Brown

Data showing NO₂, PM₁₀ & PM_{2.5} Annual Mean Levels for 2019 in Table 6.2 is from Automatic Monitoring Locations in Chelmsford City and in NO₂ Annual Mean Levels in 2019 Table 6.3 from Non-Automatic Monitoring Locations in Howe Green and Danbury. This is not acceptable data to use for SWF. Actual Non-

Automatic Monitoring should be carried out, especially given the proximity of Woodville Primary School and the proposed Early Years Provision, in the west of the development, to B1012 Burnham Road. Table C1 NO2 Sensitivity Test Modelling shows increased NO2 levels from negligible to slight at Receptors P1 & P2, Bus stop north of B1012 by Crouch Vale Medical Centre, P10 B1012 North side Opposite Woodville Primary School, P16, P17 & P18, North of B1012 in close proximity to proposed Early Years Unit in the east of Development. Early Years and Primary children will be in very close proximity to the B1012, and the children there will be affected by any increases in air pollution from exhaust emissions & dust. Children have undeveloped lungs and such pollution can have a damaging effect on their lungs, which can last a lifetime as confirmed in various articles published by The Lancet and the British Medical Journal.

THE COUNCIL feel more thorough investigation and mitigation should be undertaken to ensure the health and well-being of existing and future residents, given that DM29 of the Local Plan states "Development must also avoid unacceptable levels of polluting emissions, unless appropriate mitigation measures can be put in place."

Appendix C

P16 also shows a 10% increase which although the impact is shown as SLIGHT surely according to 5.20 of this document, in fact be should be MODERATE in this example.

8.7 AADT Annual average daily traffic show estimated figures for 2026 before and after the development BUT not during the construction period. For example Burnham Road between B1418 and Hullbridge Road cars increase normally between now and 2026 by 4.3% but by 18.4% if the development proceeds. BUT HGVs increase by 96.6% if development proceeds. This is according the Mayer Brown Ltd, how did they arrive at this?

Noise and Air Quality (Phase 2 Planning Statement)

Page 28 3.34. the application is accompanied by a noise assessment which identifies that the primary existing source that affect the site are local roads, and to a lesser extent the service yard of Sainsbury's. None of these existing noise sources present any substantial issues in terms of creating a suitable noise environment for the proposed development.

3.35 As part of the assessment, consideration has been given to potential impacts on existing residents, including through additional traffic noise. However the degree of change in terms of the noise would not result in any appreciable difference, with the long term effect being classed as "negligible" or "Minor".

Appendix 9.21 Preliminary Ecological Appraisal of Proposed Cycle Path – Geosphere Environmental –

This cycle path was not in the original Master-plan, see page 42 to 47 of Section 3 Involvement and Evaluation and should therefore be a separate planning application. Due to neighbouring garden intrusions it is unlikely that the plan enclosed is correct as it no longer has straight borders.

Paragraph 126 of NPPF states "Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities". Also according to DM29 of CCC Local Plan "Development must also avoid unacceptable levels of polluting emissions, unless appropriate mitigation measures can be put in place." Residents in properties in Hamberts Road, Glendale and King Edwards Road will be subject to increased noise and air pollution from the Redhill Industrial Estate, if trees and shrubs, which act as natural buffers are removed.

Drainage Strategy

Page 12 3.5 Historical Land Use-A minor point and probably of no significance but the railway line was closed in 1959 and not the 1920s.

Environmental statement Volume 3 Non technical summary

Page 19 realignment of Bridleway 25 - does not connect to the rest of the existing bridleway except by a detour through the development. Is it envisaged that horses will be passing through this part of the new development or that it will remain a cycle path. If so how will horse riders access the rest of the bridleway?

What is envisaged for safe crossing of pedestrians to access the existing southern part of the bridleway 25?

Page 54 If no construction traffic will pass through Woodham Ferrers, what route will it take and how will it be enforced? Bearing in mind that it is envisaged that the lorries will be eight wheelers.

Site waste management strategy

Same comment as page 54 under Environmental statement Volume 3 Non technical summary. What route is envisaged for these 8 wheeler lorries, together with times and days? More information required and surely a planning condition.

Appendix 4.1 Parameter plans and drawings

Once again as mentioned under Page 19 realignment of Bridleway 25 of Environmental statement Volume 3 Non technical summary, the realigned bridleway 25(46) will become a pedestrian and cycle path joining up with the existing bridleway 25(46) which will remain accessible for horses.

Social, Medical & Education

Environmental statement Volume 3 Non technical summary

Page 38 7.77 of the report admits that there is an existing shortfall of primary care for the existing residents which will be made worse by the new development. This major social problem is dealt with in eleven lines with a vague solution that it is someone-else's problem that can be solved by S106 money. Applicant expects to contribute financially towards increased GP surgery capacity. Crouch Vale Medical Centre has plenty of capacity, but needs more medical staff especially Doctors/GPs. Therefore, how will the applicant fulfil this need?

With regard to Affordable Housing THE COUNCIL would prefer that the affordable housing strategy includes provision for all affordable homes to be offered to existing residents of SWF in the first instance, for all tenure types.

Wildlife & Habitat

Appendix 9.21 Preliminary Ecological Appraisal of Proposed Cycle Path – Geosphere Environmental –

Unfortunately the appraisal is very poor regarding species data, although an extended habitat survey was completed in June 2021 where are the records of the warblers that can be heard singing on site? There is also no mention in the appraisal of nocturnal species such as tawny and long-eared owl together with hedgehogs to mention just a few. The major failing with this survey is the fact that the data used is the Essex Wildlife Trust Biological Records Centre's and Geosphere Environmental's own Bat, Badger, Reptile and Great Crested Newt reports (there is no indication that they are relevant here). It does not use the Essex Record Centre Service which is recognised widely as the main source of species records for the County. The Essex Record Centre works in partnership with Buglife, Butterfly Conservation, Essex Amphibian and Reptile Group, Essex Bat Group, Essex Birdwatching Society and GeoEssex all recognised experts in their chosen fields. Much if not all of Essex Record Centre Service's data is not on the Essex Wildlife Trust Biological Records Centre. A more thorough wildlife survey should be conducted as the site could not be accessed when the report was written.