

# South Woodham Ferrers Town Council

## Response to Maldon District Council

### Call for Sites Consultation

**FINAL SUBMISSION VERSION**

#### Distribution:

Right Honourable John Whittingdale OBE MP  
Essex County Council  
Regional Essex County Councillors  
Maldon District Council  
Chelmsford City Council  
Maldon District Councillors  
South Woodham Ferrers Wards Chelmsford City Councillors  
South Woodham Ferrers Town Councillors  
Dengie area Parish Councils  
Woodham Ferrers & Bicnacre Parish Council  
Danbury Parish Council  
Rettendon Parish Council

## 1 Executive Summary

- South Woodham Ferrers Town Council (SWFTC) is extremely disappointed not to have received any formal consultee notifications from Maldon District Council regarding this consultation. Whereas we understand that District / City Councils within the area of mid, west and south Essex do not have a history of joined-up thinking or collaboration, we believe it is impossible to represent a balanced opinion to potential new residents and developers of new sites when potential infrastructure requirements are handled as isolated projects within District and City Council boundaries.
- SWFTC believes that the current call for sites distribution, especially sites deemed suitable for development (coloured green on the interactive map), is too weighted within the southern area of Maldon District Councils' boundaries.
- SWFTC believes that the balance of suitable sites as currently shown will place too much burden on the road and rail transportation infrastructures, which would require significant investment at County and Government levels to support the number of homes proposed.
- For the last 10 years, and indications suggest for the next 5-8 years, Chelmsford City Council and Essex County Council have concentrated their transportation infrastructure expenditure to the North of Chelmsford with committed budgets for new roads and new railway stations. SWFTC believes that more calling of and selecting sites nearer these strategic transportation development infrastructure areas would present a better option to both potential new residents and existing residents within the total call for sites district.
- Irrespective of the future chosen suppliers and contractors, there may still be a need for new nuclear power generating capacity at Bradwell. SWFTC understands this need and that it may demand a minimum number of allocated dwellings within the immediate area.
- SWFTC believes this total LDP allocation has not been mitigated with enough geographic balance and indeed, strengthens the case for more site allocations to be found within the northern areas of Maldon District Councils' boundaries and strongly opposes the current indicative proportions that are shown for new dwellings in the south of the district.

## 2 Introduction & General Observations

### 2.1 Site Map (snapshot 3<sup>rd</sup> March 2022)

This report, including the following snapshot of the interactive call for sites map, was presented to and considered by the SWFTC's Planning Committee members on Tuesday 8<sup>th</sup> March 2022.

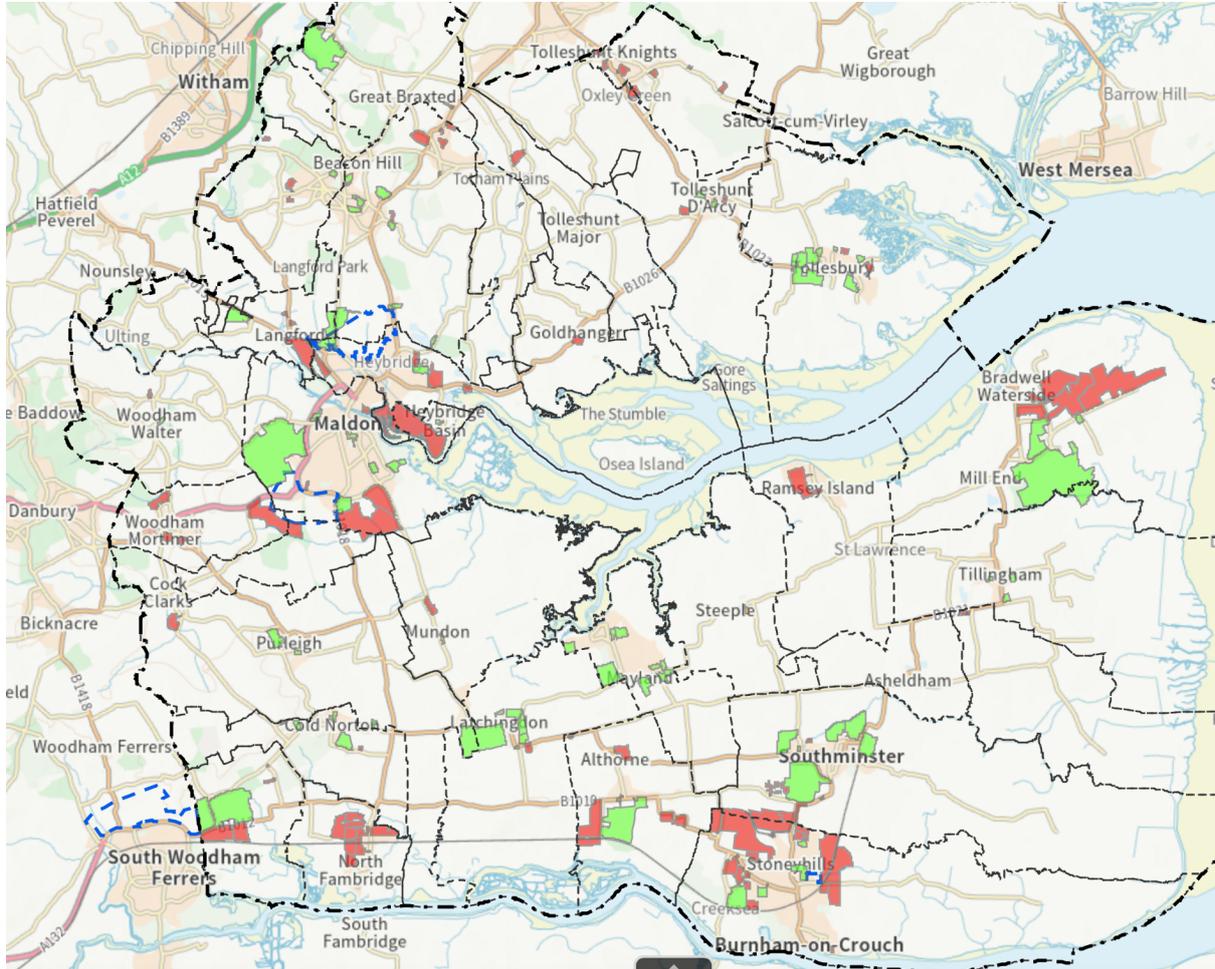


FIGURE 1 – SWFTC – CALL FOR SITES – SNAPSHOT.

#### 2.1.1 General Observations

- SWFTC believes the current site allocations are too concentrated in the South of the Maldon District Council area and will place extra burdens on the road and rail infrastructures that are already near capacity for some of the peak hours commute ingress and egress routes.
- The allocation of sites is too heavily centred on the 'Dengie Peninsula', which has the least number of suitable road and rail ingress and egress connections.
- The nearest mainstream leisure facilities and national tier retail space centres are, when using road transportation, located at Chelmsford, Basildon and on a smaller scale, Maldon. These journeys by bus, except for Maldon, require an allowed time of more than one hour each way. As such, accessing these centres by bus will not be feasible for many.

- The nearest mainstream leisure facilities and national tier retail space centres are, when using rail services, located at Stratford in East London or the City of Southend. These journeys require an allowed time of more than one hour each way. As such, accessing these centres by train will not be feasible or the desired option for many.
- As such, these sites for leisure and retail purposes will rely heavily on private road transport with the capacity for shopping bags (both food necessities and consumer goods). We believe the regional road infrastructures cannot support the increase in traffic without significant investment from the County Council and or Central Government.
- The amount of locally available employment will not match the increase in population. In addition, local employment opportunities may not support the mortgage levels required by these developments. There will be a need to commute for work for both the unskilled workforce and the skilled workforce.
- SWFTC, therefore, believes that the area to the South of Maldon is unsuitable for locating the higher proportions of Government-mandated number of dwellings, and hence sites, as currently shown.

### 3 Road Infrastructure

#### 3.1 Movement Classification

The following diagram represents the view of SWFTC on the potential increase in road traffic movement flows using road-based transport. This excludes Bradwell Nuclear construction traffic movements that, although will affect the wider road usage, would dis-proportionately skew the representation both being made and sought by this consultation, which is based on new dwellings under the DCO and the road journeys added by those new dwellings.

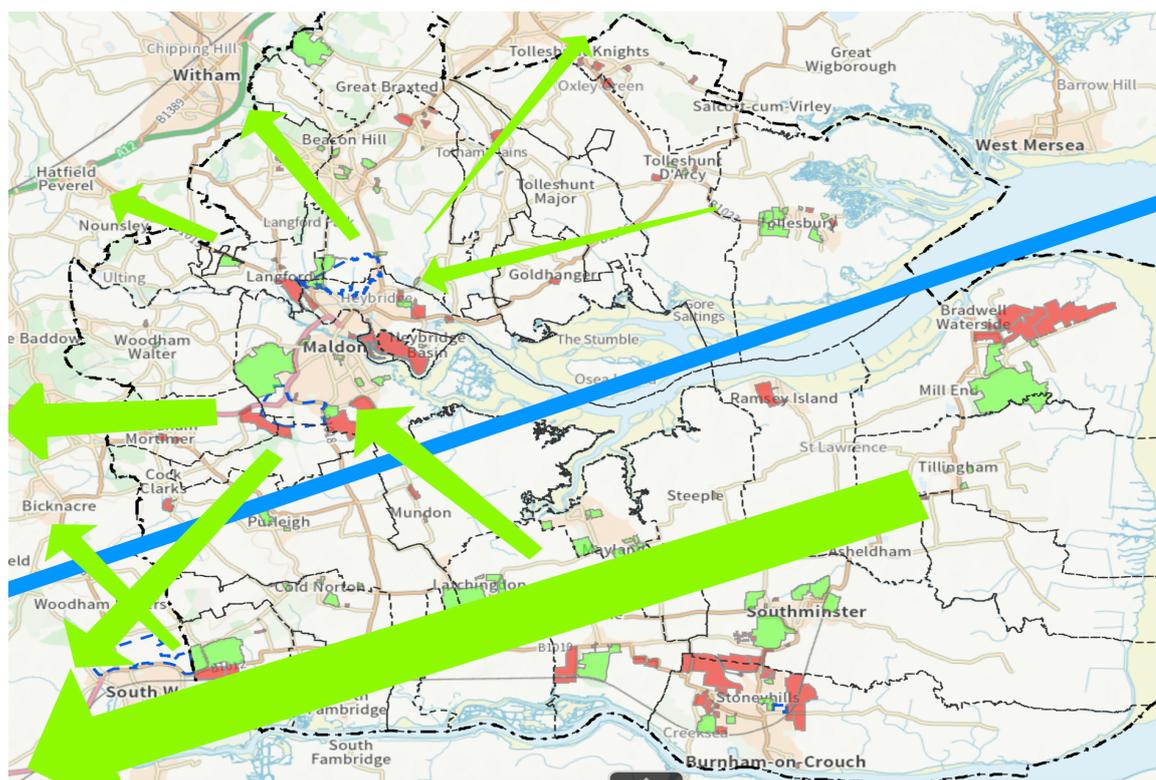


FIGURE 2 – SWFTC – FORECASTED JOURNEY INCREASE

##### 3.1.1 Road Traffic Observations

- SWFTC believes the road infrastructure for the current call for site allocations divide into two halves, indicated by the blue line on the map.
- Most of the sites to the South of the blue line will mainly use the Burnham Road B1012, the Bicknacre Road B1418 and A132 through South Woodham Ferrers as the principal method of road movements to and from the district. This is a formed opinion of SWFTC and is based on various research and information sources, including, but not limited to.
  - Essex County Council (Highways)
  - Chelmsford City Council
  - Maldon District Council
  - Bradwell B Development Forums
  - Mayer Brown (Consultants)
  - SCP (Consultants)
  - Countryside Properties
  - SWFTC Research

### 3.1.2 Road Traffic Analysis

- Based on the figures supplied for the green coloured sites, the number and proportion of new dwellings shown are calculated as follows.

		North of blue line	South of blue line
Required: Number of extra dwellings LDP	Dwellings	<b>4,492</b>	
Call for sites (suitable, green) from the map	Dwellings	<b>3,238</b>	<b>7,745</b>
Required: Proportioned against LDP	Dwellings	<b>1,324</b>	<b>3,168</b>
Percentage split	Percentage	29.47%	70.53%

- SWFTC believes the proportioned requirements for the number of dwellings required is currently too heavily focused to the south of the district where the number of road egress and ingress points are fewer than they are in the north of the district.
- The current road infrastructure using the Burnham Road is already forecasted to be at the peak of its handling with the new developments planned for the land North of South Woodham Ferrers. As such, SWFTC believes there is no additional capacity, or throughput achievable with any further junction alterations, to handle traffic demands that a further (say) 3,168 dwellings would demand.
- SWFTC believes traffic mitigations used in South Woodham Ferrers by planners to grant the selection of site 10 in SWF may exceed the limits of viability (such as car share and cycling). These mitigations will be impossible to deliver if the current proposed sites and site allocations in the south of the Maldon district are given the go-ahead. SWFTC believes this would cause a material increase in the traffic through South Woodham Ferrers that would break all forecasts and capacity figures currently used.
- Figures and statistics aside, it is clear the new and existing road users of both South Woodham Ferrers and those on the 'Dengie Peninsula' would suffer delays that exceed national guidelines should these proposed site allocations translate into approved development sites.
- As such, SWFTC opposes the current call for site indications and suggests that more sites are called for in the north of the district where potential road upgrades into those already planned by Chelmsford City Council and Essex County Council are easier to fulfil and deliver an integrated transport infrastructure.

## 4 Rail Infrastructure

### 4.1 Rail Movement classification

#### 4.1.1 General Observations

- One of the attractions continuously used to steer call for sites allocations in Essex has been the availability of suitable rail infrastructure to allow people to 'commute' by rail to work. This has been central to selecting new residential site locations throughout Essex.
- SWFTC expresses the following concerns regarding the potential increased demand for the rail infrastructure.
  - The capacity of the Southminster branch line, train frequency and train length to handle an increase in peak hours demand from passengers using this line.
  - The ability of Network Rail and the Train Operating Company to deliver peak time through train services from the branch line to and from London Liverpool Street.
  - The peak hours capacity of the tracks between Shenfield and Stratford to handle an increase in train journeys.

#### 4.1.2 Branch Line Capacity

- Before Covid-19, capacity on the branch line ran at about 80% full during peak hours. In terms of train carriages (old class trains), there were.
  - For the morning peak: There were 28(\*32) carriages (3 by 8 carriage trains, 1 by 4 carriage train) through trains from Southminster to London Liverpool Street.  
\* A further 4 carriages were available at South Woodham Ferrers (converting an 8 carriage to a 12 carriage train).
  - For the evening peak: There were 20 carriages (2 by 8 carriage trains and 1 by 4 carriage train) through trains available from London Liverpool Street to Southminster. (This excludes the 4 carriages locked out at Wickford on one of the through services).

#### 4.1.3 Covid induced temporary changes

- SWFTC dismisses all the changes because of Covid, and whilst the demand returns to the new normality as a result from covid. SWFTC is keen to ensure that Covid is not used to skew demand or rationale in temporary and non-sustainable travel changes and only seeks to consider permanent changes in working patterns that Covid has brought about.
- Covid has, however, caused a shift in the change in working with more people being allowed to work from home for a couple of days per week. Traditionally, the approach has always been to average this reduction and use it to justify figures that 'the line will have the capacity to handle more demand'.
  - SWFTC will not support any attempt to use this somewhat naive approach of forecasting capacity.

- Most work from home days still tend to centre around Monday and Friday so that the mid-week peak will remain high, and any new demand will likely push this higher.

#### 4.1.4 Rail Traffic Analysis

- New rolling stock has added capacity to the line, but this is not seated capacity. The trains have been designed with more standing area, and any journey from any Southminster branch line station to London is longer than the recommended Government guidelines journey time (IIRC seating for all journeys over 30 minutes) for standing passengers. SWFTC, therefore, will reject any arguments that the new rolling stock carries more passengers on the Southminster branch line.
- With the new stock, train length has changed, which could increase the line's capacity if 10 car trains are used. However, 10 car trains cannot be readily 'turned-around' at Wickford so could not be used except for through journeys to and from London Liverpool Street.
- The theoretical maximum capacity for peak hours services on the branch is limited to 10 car trains that can provide a through service. These would be able to run at a service frequency of approximately every 50 minutes.
- For the morning peak, based on 3 by 10 car and 1 by 5 car through services, we believe with the new developments at South Woodham Ferrers and the additional ones that this call for sites currently proposes, that the capacity at South Woodham Ferrers would switch to standing room only for two out of the three-morning peak services to London (with only the first through-train out at around 6.30 am having seated capacity until Wickford).
- The evening peak is more drawn out over a longer time frame, with the potential to run 4 by 10 car through trains (subject to rolling stock) from London to Southminster. The current schedule just about handles the volume, but any increase is going to ensure that branch line commuters will be standing from Liverpool Street and especially Stratford, and this is unacceptable to SWFTC.
- SWFTC cannot support the level of dwellings proposed in the south of the district as the peak rail infrastructure would not handle the increase in numbers.
- Due to the change of rolling stock from 4 car to 5 car units, only one platform at Wickford has been extended to handle the non-through train services (currently, only 1 train in the morning is a through train). This results in a morning service where commuters must cross the footbridge to reach the Liverpool Street departure platform. For disabled passengers, using any non-through service towards London, there is no ability to cross the tracks without an extensive walk of almost half a mile.

#### 4.1.5 Rail Network Capacity

- Aside from the Southminster branch line, SWFTC feels it should draw attention to the network capacity on the routes into London and concerns around the peak time capacity between Shenfield and Stratford.
- Transport for London and Cross Rail will be operating train services from Shenfield, and these services will 100% consume two of the tracks between Shenfield and Stratford with

slower pace, multi-stopping trains. As such, just one pair of tracks remain for all capacity from East Anglia into Liverpool Street from places beyond Shenfield on the network map.

- Subject to confirmation of new signalling upgrades, the current maximum number of trains running in the peak hour is around 18. That assumes 1 every three minutes and allows a 5-minute buffer for the half-hourly through trains from Norwich with no freight traffic being carried during this period. There are no slots available for additional trains between Shenfield and Stratford for most of the (90–120) minute morning and evening peak periods.
- In terms of prioritising train slots, Chelmsford City Council is expanding heavily to the North of Chelmsford, as is Witham and Colchester. To the south, Rayleigh and Rochford are also expanding, and Basildon Wickford and Billericay will all continue to grow with very demanding Local Development Plans in terms of housing capacity. When Beaulieu Park Station opens, the extra capacity required to handle its demand and the expansion on the Chelmsford to Ipswich/Clacton rail corridors will require 3+ new peak train slots between Shenfield and Stratford.
- The Southend line has capacity on its trains, although usually standing only from Wickford/Billericay in peak times. Very few, if any, trains leave Billericay with empty seats, even at the rear of the trains.
- SWFTC believes that there will be a push to prioritise services on the both-way lines. Any slot capacity adjustments between Shenfield and Stratford will be given to trains that service the Southend and Chelmsford / Colchester lines.
- SWFTC believes that the call for sites should be more weighted to the north of the district where the sites are closer to the rail infrastructure that is more likely to be provided with extra capacity, along with the increase in service frequencies that both-way track running allows.
- SWFTC will no longer support any mitigation for developments along the Crouch Valley line or regional network lines that feed through Shenfield; like developer-funded bus services and cycle lanes to rail stations, as it believes the network rail service will be over capacity with the current approved development plans in operation and will not be mitigated by the further staggering of journey or working from home initiatives
- SWFTC believes the continual unchallenged mentality of ‘build near a rail line’ can no longer be viewed as an attraction or a determination of LDP site allocations and will oppose any such plans without fundamental strategic investment in rail network infrastructure.

## 5 Site-Specifics.

### 5.1 SM2 Parcels A & B, SM 3 Parcel C; Stow Maries

- SWFTC strongly objects to considering these two sites (totalling 1,557 dwellings) and requests they should be withdrawn from consideration. SWFTC believes the current and planned road infrastructure through South Woodham Ferrers will not handle the peak traffic flows generated.
- Our rationale for overall traffic flows has already been provided within this document. Still, these sites, due to their proximity with South Woodham Ferrers, would cause a significant spike in the peak time road traffic flows that could not be handled, even with mitigation, by the existing road layouts through South Woodham Ferrers.
- SWFTC is aware that, apparently, there is no further budget available from Essex County Council for road improvements or new roads. Current road improvement plans shared by Bradwell nuclear development do not include any roads within the boundaries of the parish of South Woodham Ferrers. SWFTC must therefore object to the size and proximity of this proposed site.
- SWFTC is aware that the developers may be keen to develop this site and will use many items of attraction (like free buses to the rail stations), which does not solve a problem but creates another one; lots of cycle lanes and everything else). However, these are all unproven in semi-rural areas and would not take people to the centres of leisure, employment, and non-food shopping, so car use will still be high, as it is for all semi-rural development sites.
- The limits in the capacity of rail services will result in more car journeys to either Wickford, Chelmsford or Pitsea rail stations, putting demand on these areas, forcing commuters to start their morning commute to work earlier so they can get into these car parks before they fill.

### 5.2 ALT2 - Althorne

- SWFTC strongly objects to the consideration of this site (1,750 dwellings) and requests that it be withdrawn from consideration. SWFTC believes the site's location makes it heavily dependent on using the rail network as its principal means of commute. Such demand would create passenger congestion on trains at South Woodham Ferrers.
- Our rationale for overall rail capacity has been provided within this document. SWFTC believes that the Southminster branch line and the regional line rail capacity would not handle this site, especially if some smaller sites in Southminster and Burnham on Crouch remain for consideration.

END