

Please find below the comments on behalf of South Woodham Ferrers Town Council regarding the planning application Willow Grove Meadows 22/00311/OUT

Throughout this document, the following abbreviations will be used:

- The Council = South Woodham Ferrers Town Council
- 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 town's 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 effects on the existing town.

Executive Summary

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

Strategic Policy S10 - Securing Infrastructure and Impact Mitigation
Policy DM18 - Flooding/Suds

South Woodham Ferrers Neighbourhood Plan 2020-2036 is not referred to in the Outline Planning Application and it is felt that Section 8 page 56 "Local flood risk and patterns, particularly along Burnham Road....." are not fully considered. In addition, it is not referenced in the transport assessment, section 1.9 January 2022.

In addition, it is felt that these areas of the application contravene NPPF 2021, in particular...

Paragraph 126 "Good design is a key aspect of sustainable development.... creates better plans in which to live and work and helps make a development acceptable to communities".

Paragraph 159 "Where development is necessary for 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 appear to be some aspects of data collection that are dated, incomplete and/or not relevant to South Woodham Ferrers. The Council would recommend that this planning application is refused due to drainage concerns and possible flood risks.

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.

The Town Council is extremely disappointed with the transport assessments. We have another set of detailed documents produced by so-called experts providing an in-depth analysis of local road conditions and predictive congestion and traffic growth. Most of these documents are library template masters in which figures and fuzzy paragraphs have been inserted in an attempt to make the traffic assessment fit that which is needed to obtain local planning approval. Indeed, we observe things like 'walk to Rayleigh' without the local knowledge that there is a river in the way, and traffic tables that predict eight people will arrive in South Woodham Ferrers by Underground, Metro, Light Rail or Tram.

We, therefore, recommend this planning application is refused until a cohesive, joined-up, and accurate transport assessment for South Woodham Ferrers is produced, where the figures and the local research can be 'believed'.

Detailed Area of Comment

Highway & Transportation Concerns:

The traffic assessment documents supplied by the applicant contain several inaccuracies, poor references, invalid data sets, and traffic surveys carried out five 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.

In addition, this assessment and the Countryside Assessment are 'playing-off' against each other. Neither considers the collective impact both their plans have when combined, which, after all, is the reality should both planning applications be approved this is reinforced by the application of Bradwell B and related increase of traffic.

Transport Assessments

3.18 – The bus services are overstated and exaggerated in this paragraph. The 36 services have been reduced to hourly with no Sunday service meaning regional shopping centres cannot be reached from South Woodham Ferrers by any bus service on a Sunday.

3.23 Leisure facilities in Chelmsford will not be reached by railway. The route takes more than 2 hours each way, and based on train miles; it is too expensive to go via Shenfield. These statements show that the authors of this assessment have no local understanding of public transports services through South Woodham Ferrers.

4.10 as indicated, the bus service mitigations used to support this document are unrealistic and not reality. Even with a conversion to bus travel based on nationally reachable targets, the required mitigations will still fail. SWF is an Island; its geographical location means it will always require heavier car usage than other more contiguous urban centres within central Essex. This is not resistance to change; this is based on road usage assessments.

4.12 The car-parking provisions assume that 1-bedroom properties will only operate one car. This is not the reality in South Woodham Ferrers. It never has been, and the proof can be sought if required from the current blocks where 1-bedroom properties are provided (such as Littlecroft and Tallow Gate). The Chelmsford Local Plan has failed to distinguish high-density living in the centre of Chelmsford (with its extensive public transport links and local facilities) from that of South Woodham Ferrers. Irrespective of the Chelmsford Local Plan stating aspirations for the whole of the Chelmsford, this planning application should be 'configured' to the needs of South Woodham Ferrers. We suggest an allocation of 1.5 spaces per 1 bedroom (or every other property has 2). This should not impact the visitor parking spaces either.

5.5 The Table (Table 5.3) is grossly inaccurate of reality. Indeed, it predicts and increases traffic along Hullbridge Road, but none of the through roads that lead off it. This would indicate they expect cars to drive to the railway station (since there is no other real use). However, the peak time figures (when people use the railway) do not suggest this. As such, these tables and much of this transport assessment cannot be used.

5.8 Table (5.4) demonstrates the reality of proposed car use. This table (which we believe is slightly more realistic than others within the assessment) clearly demonstrates that single-occupant car journeys will be the primary mode of transportation in South Woodham Ferrers. As such, if this table is taken as gospel, much of the rest of the document is based on inaccurate assumptions and figures.

Transport Scoping Note (December 2020)

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 reinforced 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.”

Traffic Study -Framework Travel Plan January 2022

Over-reliance on “environmentally modes” of transport given that SWF is a rural town. The reduced train service increased car use to travel to Wickford Railway Station and further afield to C2C Rail Line. Only one bus service to Wickford and beyond. 36 bus to Chelmsford takes a long time compared with car journeys and is unreliable compared to routes within the City.

General Observations on Transport

Rat runs may emerge because of the new proposed road layouts, junction alterations and the increase in light-controlled pedestrian crossings.

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 significant 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.

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.

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 intersections in-between. This cut-through is already used more frequently since the opening of the Hullbridge road roundabout junction, which has increased peak time queuing on Burnham Road. Again, this has not been assessed in the plans provided despite the impact the Development would potentially have on them.

The application does not 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 significant new development within North Fambridge which highlights South Woodham schools and shops as their nearby services; this new development has not been considered within the traffic modelling of the B1012.

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 upgrade the zebra crossing to a light-controlled crossing. The Essex Highways Local Highways Panel Members Guide states that it would be more suitable for a road with traffic travelling at more than 35mph.

Inaccurate Referencing

- On page 9, Figure 2.6 shows that Elmwood School and Woodville School are within a 2 km 25-minute walk of the site. However, the Local Plan states Collingwood School, which is 3km from the site, as the only primary school with capacity.
- -On page 10, Figure 2.7 shows ECC Public Rights of Way and allows traffic-free walking to Hullbridge and Hockley, which are on the other side of the river Crouch. ECC has not maintained this right of way and has recently stated it is low on their list of priorities.

Drainage Concerns: Strategic Water Attenuation

The Council has serious concerns about the drainage strategy. The current solution is not credible, which is evident because many parts of the application are vague around 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 in recent years because 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.

Tidal Flood Risk

The Town Council has concerns that the information used on page 18, Paragraph 3.23 for the tidal boundaries from Coastal Flooding Boundary was published in 2014. It is felt this is dated and more recent data should be used given climate change and the increasing occurrence of storms and tidal surges. In 2022 there have been four named storms Corrie, Dudley, Eunice & Franklin. The last two resulted the Environment Agency issuing flood warnings, and Franklin resulted in the river Crouch overtopping the sea wall in several places. Additionally, there is a breach of the sea wall along the tidal Fenn Creek adjacent to Eyotts Farm Sailing Club, which is subject to an ownership dispute between Essex County Council and the Environment Agency.

On Page 17, Paragraph 3.20, it is acknowledged that "There is, therefore, the possibility that the development site is at risk of flooding during an extreme tidal flood event" given that there have been at least two in February 2022 already; this comment reinforces these concerns. This is further supported in Diagram 3.4, page 19, which shows the possibility of the "southern portion of the site" becoming "partially flooded".

Overall, there are several places where the seawall is in poor condition, not helped by the inability of the Environment Agency to repair a further damaged sluice a little further on from the aforementioned damaged sluice. Any additional flow from this proposed development could cause an adverse effect on people and properties in the existing South Woodham Ferrers Township.'

Fluvial Flooding

The Town Council has concerns that the data used on Page 13, Paragraph 3.3 is dated. The information referred to from Environment Agency relates to flooding at Shaw Farm from 2012 and 2014. On page 15 Paragraph 3.11 "Flood Risk Study for Rettendon and Fenn Brooks", produced by Mott MacDonald is also from 2014.

Surface Water (Pluvial) Flooding

The Town Council has grave concerns that Ardent considers that the "Environment Agency Risk of Flooding from Surface Water", diagram 3.5 on Page 20, which shows most of the development area to be at medium to high risk of surface water flooding to be "significantly overestimating the risk of flood risk on the site". Using their own modelling of the risk of flooding, Diagram 3.6 on page 21 reduces to low to medium on only part of the site.

Although Paragraph 3.31 on page 22 acknowledges, there is a medium risk of surface water flooding on the site.

Foul Water Drainage

The Town Council has grave concerns regarding the disposal of foul water from the site. On page 35 Paragraph 6.1 it states that “Anglian Water is the statutory water authority serving the site”, and Paragraph 6.2 it states that the “proposed foul connection will connect with the existing server”. Anglian Water has previously commented that there is currently no capacity for foul water from any new development in the existing network.

Wildlife & Habitat

The Council has concerns regarding the impact of the development on wildlife and habitat because of the development; the points are highlighted below within the appropriate document:

The Town Council was pleased to note that a comprehensive Bat Survey had been completed of the site.

Tree Report Arboricultural Impact Assessment January 2022-Underhill Tree Consultancy

The Town Council are pleased to note that in the preliminary report that only two trees and a section of hedgerow needs to be removed, and it appears that existing “roadside vegetation” appears to be maintained as stated on page 56 in the South Woodham Ferrers Neighbourhood Plan 2020-2036.

Maldon Local Plan

Table 4.2, although considering Bradwell B, does not cater for any other developments in Maldon District Council’s area, both now and in the near future. (see also Maldon District Issues and Options Consultation)

Eyotts Sailing Club

8.3.8 Eyotts Sailing Club has been ignored as a local amenity or recreation

Desk Study Source Material

9.3.14 Information for the Desk Study was sourced from Essex Wildlife Trust. 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.

Inconclusive & poor-quality survey

9.5.24 and 9.5.28 This report is generally dismissive of the dire plight of Britain's farmland birds, and it is clear that this habitat is not being replaced in any measure by this development.

Not wishing to doubt what the surveyors observed on their visits, the following have been reliably recorded by local observers.

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

Archaeological Desk Based Assessment

This states:

1.11 Due to Covid-19 relevant archives were not visited including Essex Records Office, nor a site visit

4.44 Assessment of significance

Potential Neolithic - unknown

Bronze age - unknown

Iron age - unknown

To satisfy Local Planning Policy

Strategic Policy S3

Policy DM15 - Archaeology

Further assessment is required in view of 1.11 above, especially as in the Geophysical Survey Report 8.4 states that 'a number of linear, curvilinear, and discrete anomalies have been detected'

END