

Dear Secretary of State,

**Re: Land North of Burnham Road, South Woodham Ferrers, Essex
Planning Application Number: 21/01961/OUT Hybrid application part full and part outline**

South Woodham Ferrers Town Council (SWFTC) believes that the above-mentioned planning application should be called in for determination under the following criteria:

The House of Commons Briefing Paper - "Calling in Planning Applications (England)" Section 2.

- may conflict with national policies on important matters
- could have significant effects beyond their immediate locality

SWFTC believes that this application contravenes the **National Planning Policy Framework July 2021** in several instances as follows:

Section 2 Paragraph 12 (pg 7) and Section 3 Paragraph 30 (pg 10) – The Neighbourhood Plan dated December 2021 has seemingly not been taken into account in decision making, relating to the South Woodham Ferrers Neighbourhood Plan Objectives 02, 03 and 05.

Section 7 Paragraph 88 (pg 25) – The number and standard of proposed crossings across the Burnham Road B1012 and distance of the development which is up to 4km from the existing Town Centre make it prohibitive for younger and older residents to access without some form of transport. The main footway, connecting the development, over the town's busiest road is too narrow according to LTN/120 at 2m wide for mixed use, rather than the recommended 3m and only tested for 7 single pedestrian uses per hour, not the many dozens of crossings per hour we would anticipate.

Section 8 Paragraph 95 (pg 27/28) – The proposed primary school for the development is Collingwood School (Local Plan Strategic Policy S9) and which is up to 4km from the development. It currently has 260 pupils on roll compared to 212 in 2016 and 239 in 2021 as stated in the Ofsted reports. The increasing roll would indicate that the Essex County Council and the Secretary of State for Education need to work collaboratively to ensure that there will be sufficient primary places for the existing and new community. Pedestrians will have to walk across and along the Burnham Road B1012, which is the key road corridor for the town and motorists from the Dengie Peninsula. Then cross back over the Ferrers Road, which could potentially become a "rat run" for motorists avoiding the B1012 and where no signalled crossing is proposed.

Section 9 Paragraph 104 (pg 30) - Traffic delays in the assessment provided by the developer are lower than those measured in 2013-2020 which can be considered questionable given the minimal highway infrastructure alterations proposed. The 1020 houses proposed in the development will lead to an increase in traffic, as well as the traffic predicted from the related and adjacent 200-house 'Bellway' development. The Secretary of State may be able to take account of the wider, regional traffic impacts such as those which will come from the 3500 homes approved or under construction in the nearby Maldon District/Dengie Peninsula since 2018, and a further 1500-2000 houses which are currently being considered in the same area, much of which will pass through South Woodham Ferrers. Traffic volumes have only been tested to 2026 when the development will barely have begun, instead of 2033, when the development will be complete. For this reason, the development will have more significant traffic impacts on the local area than those assessed or stated.

Section 8 Paragraph 105 (pg 30) – The B1012 is the key travel corridor for motorists off of the Dengie Peninsula. It is currently the outer ring road for South Woodham Ferrers with housing and Woodville Primary School abutting its length. The proposed downgrading to an urban street and increase in pedestrian crossing and new junctions will increase idling and stop start traffic increasing vehicle emissions along its length, potentially increasing the risk to health of children and residents.

Section 9 Paragraph 110 a (pg 31/32) – The bus proposed shuttle service to Wickford Railway Service at peak times and increased service to Chelmsford will only come on board as the development is built, it extends to new residents only and has a time limit. The Wickford to Southminster Branch Line has no proposed improvements and has seen a reduction in its service since 2021. More commuters are choosing to drive to Wickford and Pitsea Railway Stations to access the Greater Anglia Lines into Liverpool Street and C2C Line into Fenchurch Street increasing traffic along B1012/A132 corridor.

Section 9 Paragraph 110 b (pg 31/32), Paragraph 111 (pg 32), Paragraph 112 c (pg 32) – The proposed number of new crossings and junctions across Burnham Road B1012 will greatly increase the movement and interaction of pedestrians, cyclists and vehicles across and along its length and the potential for “conflicts” and reduce the safety for all users. New street signage will add the potential for “street clutter”.

Section 14 Paragraph 159 (pg 46), 161 (pg 47), 167 (pg 48) - Much of the development is situated on higher land than the existing town of South Woodham Ferrers and much of the surface water run-off will drain down towards the town and to the east and west of the development. Although the development appears to have taken account of on-site flood risk through proposed SuDS schemes. SWFTC has concerns that the increase of flood risk elsewhere in the town have not been fully considered, particularly along Fenn Creek to the West of the development and to the East where the Garden of Remembrance and Wickford to Southminster Railway Branch-line is situated. Along Fenn Creek there is a breach in the sea wall which is the responsibility of Essex County Council. Here there is already the potential for risk of flooding to existing resident’s properties.

In addition to the NPPF Policies we believe that some policies in the **Chelmsford Local Plan (adopted in May 2020)** have been overlooked, including:

Strategic Policy S9 Infrastructure Requirements: for Transport & Highways, Community Facilities including education, health and community facilities and Utilities in particular water supply, foul drainage and waste water treatment.

Summary

In summary, South Woodham Ferrers Town Council remains concerned about several aspects of the proposed development, and have listed the categories together which National policies, Chelmsford City Council’s Local Plan and SWFTC’s Neighbourhood Plan they feel have been overlooked, including and not restricted to the following:

Traffic, Transport, Highways -NPPF Paragraphs 88,105,110, 111 and 112, Chelmsford Local Plan – Strategic Policy S9, Neighbourhood Plan Objective 02, Spatial Interpretation of the Vision and Objectives, Improving Access and Movement.

Provision of a new School -NPPF Paragraph 95, Chelmsford Local Plan Strategic Policy S9, Neighbourhood Plan page 60.

Sewerage and Drainage -NPPF Paragraphs 159, 161, and 167, Chelmsford Local Plan Strategic Policy S9 section on Utilities.

Wider Traffic impacts not considered - Finally, this planning application has not taken account of the existing and potential future development on the Dengie Peninsula, as part of the Maldon District Local Development Plan (currently under review), and/or the possible development of Bradwell “B”.

For and on Behalf of South Woodham Ferrers Town Council

6th April 2023