

Feering Parish Council (FPC) – Interested Party ref 20032790
Deadline 2 submission (13 February 2023)

To clarify any ambiguity from the opening words of Councillor Evans at OFH2 on 23 January, Feering Parish Council (FPC) **support** the proposed new location for Junction 24 on the west side of Inworth Road / south of Feering. FPC support the proposed new location as Junction 24 will be an all-movements junction and because National Highway's traffic predictions show reduced traffic through Feering (London Road and Feering Hill) and through the pinch-point of Kelvedon High Street in the Conservation Area.

1) DEVELOPMENT SITES TAKEN INTO ACCOUNT

As stated at the OFH2, FPC have concerns about National Highway's traffic predictions – other interested parties also have concerns. National Highways OFH1A summary technical note [REP1-009] is helpful but also concerning as the base traffic survey was actually in 2016, not in 2019, updated with available information in 2019. 2016 is over 6 years ago now.

A cause for concern for FPC, as stated at OFH2, is which developments National Highways have and have not taken into account in:

- environmental Cumulative Effects Assessment (CEA) – Appendix 16.1 the short list and long list [Appendix 16.1 APP-182 and Appendix OFH2B REP1-012]
- Transport Predictions “near certain” and “more than likely” sites [APP-264]

Appendix OFH2B in 9.13 National Highways response to OFH2 [REP1-012] where Parish information has been included is helpful – thank you. By comparison the short list and long list in Appendix 16.1 [APP-182] does not include Parish information. With the Parish information now included and just scrutinising the information for the Feering & Kelvedon Ward, errors are identified in terms of:

- developments not included in the short list when they should be.
- developments in incorrect Parishes.
- distances of developments from the A12 incorrect.
- developments duplicated.

Development sites are described differently with different ID numbers in Appendix A Uncertainty Log in 7.3 Combined Modelling and Appraisal Report - Appendix C: Transport Forecasting Package Report [APP-264].

The concern is that sites are not being consistently included or excluded in the traffic modelling and environmental assessments and may be located in the wrong Parish. Examples for the relatively small Feering & Kelvedon Ward are below.

It is requested that National Highways check, correct and update the short and long lists to remove site duplications and to enable an comparison with sites included in the traffic predictions.

Inconsistent examples in Feering & Kelvedon Ward (there are more)

A. Feering development 19/01222/REM (from 16/00569/OUT) was granted on 8 June 2020. This is a 162 (was 165) homes development by Bloor Homes on FEER 233A, part of Crown Estates land FEER 233 which is included in the Feering Strategic Growth Location Policy LPP21 in the BDC Adopted Local plan. This estate is building with people already moved in. **So it should be included in the short list** in Appendix OFH2B [REP1-012] – **but it is NOT.** It is in fact erroneously included in the long list under Boreham Parish, Chelmsford City Council planning district.

However, in Appendix 16.1 [APP-182], National Highways have given this development ID 13 and placed it in the long list as it has been associated with 19/02234/REM which was withdrawn in December 2019. No account has been taken of the almost parallel 19/01222/REM which was granted.

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This site is correctly included as the “near certain” site ID 6 in the traffic modelling being described as ... “Land north east of Inworth Road (Part of Strategic Growth Location Land south of Feering/west of A12)” with 162 homes 100% built by 2027.

B. BDC Local Plan allocated site FEER 233 is part of LPP21 Feering Strategic Growth Location on Crown Estates land. This is included in Feering in the long list in Appendix OFH2B [REP1-012]. However, in Appendix 16.1 [APP-182], this is site ID 92 which National Highways have described as... *an allocation for 750 or more dwellings*. It has not been included in the short list as...*Separate development application 20/01434/FUL associated with this site is considered in its own right, hence this allocation is not taken forward to the short list*. This is an entirely incorrect association as application 20/01434/FUL is a Redrow Homes development off Hatfield Road in Witham.

The site is not included by National Highways in the traffic modelling but it is such a large site with commercial development as well as housing with much of the site straddling Inworth Road, that it seems extremely short sighted not to take the future traffic flows and environmental effects of this site and the Strategic Growth Location into account. Pre-App discussions are taking place.

C. Kelvedon – near certain ID 96: Land adjacent Watering Farm Coggeshall Road, 35 homes 100% built by 2027. Whilst taken into account for traffic modelling this (small) Parker Strategic Land site 17/02271/OUT & 20/02128/REM, ID 38, is omitted from the Environmental Statement Short List and from the CEA.

D. Kelvedon – more than likely ID 22: Station Field, Land west of Kelvedon Station Station Road (Monks Farm), 250 homes 84% built by 2027. This Cala Homes development of 238 homes off Coggeshall Road is building out now.

This site is correctly included in the Environmental Statement short list as application 19/01025/FUL with ID 20. However it is **also** included as ID 46 **and** ID 47 in the Appendix 16.1 [APP-182] long list as the Cala Homes application 19/01025/FUL **and** as the Parker Strategic Land application 19/00679/REM (referencing 17/00418/OUT). However, in Appendix OFH2B [REP1-012] it is in the long list under Rivenhall Parish.

E. It is complicated to follow the route of some planning applications, as evidenced by the fact that in OFH2 [REP1-031] Councillor Evans was referring to the small 35 home Parker Land Watering Farm application – see (C) above – whereas National Highways in their response referred to the Parker Land application 21/03579/OUT for 600 homes etc. National Highways state that this large development was not considered in the Environmental CEA stating, correctly, that it is not on land allocated for housing in the BDC adopted Local Plan. However National Highways **have included** this large development as ID 27 in the Short List in both Appendix 16.1 [APP-182] and in Appendix OFH2B [REP1-012] as application 21/01631/SCO.

This site is not included in the traffic modelling. This BDC outline application is still “pending consideration”.

2) A12 PROPOSALS AND LOCAL ACCESS / WCH ROUTES

(i) Feering Parish Council are pleased to see several new “footpaths” on land due to be permanently acquired by National Highways. There are several stables & paddocks in Feering and Kelvedon and also a network of East Anglian Farm Rides. Essex County Council / Essex Highways proposals for the de-trunked sections of the current A12 include provision for walkers, cyclists and horse-riders. Feering Parish Council have declared a Climate Emergency and are therefore keen to encourage local activities that are family friendly and do not require the use of a car. So where possible new routes should be available to cyclists and horse riders as well as pedestrians, with circular routes for families with buggies, dog walkers, runners, etc. For example the new path from Worlds End Lane to Inworth Road and the new path in Kelvedon from Highfields Lane to Ewell Hall WCH bridge.

(ii) It is requested that consideration be given to providing a path from Inworth Road, in the vicinity of Hinds Bridge / Domsey Brook, north-east approximately along the line of the current A12 (which is being dug up)

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to the new Prested Hall overbridge. This would provide a circular WCH route connecting with the new path from Worlds End Lane to Inworth Road - see (i) above. The route would be all on National Highways land.

(iii) As previously stated, the historic brick Hinds Bridge on Inworth Road is narrow with no safe route for pedestrians and cyclists. Improvements are requested.

(iv) The current plans stop up both Prested Hall drive and Feering PROW 15 to the east. These routes are used together with the current Threshelfords bridge over the current A12 as a convenient and semi-rural circular route. It is requested that National Highways provide a public WCH crossing over the new A12 in the general area of Prested Hall Drive / Feering PROW 15 to maintain this north-south connectivity.

(v) The north end of Easterford Road is currently and will still be in Feering Parish. FPC were not advised and not consulted over the proposal, first shown in the Supplementary Consultation of November 2021, to gate the new Easthorpe Road bridge over the new A12 so that it was not available for general vehicular traffic. FPC are against this gating as it removes a historic access to the A12 and so is a decrease in the road network not an improvement. Traffic to / from Easthorpe wishing to join the A12 will either have use the narrow lanes to and through Messing for Junction 24 or the lanes to Copford for Junction 25 at Marks Tey. FPC request that the proposed gating for the new vehicular Easthorpe Road Bridge is removed.

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