

## NORTH FAMBRIDGE PARISH COUNCIL



Clerk: Mrs. Christine Wakeling  
9 St. Stephens Road  
Cold Norton  
Chelmsford  
Essex CM3 6JE  
Tel: 01621 828244  
[chriswakeling1@yahoo.co.uk](mailto:chriswakeling1@yahoo.co.uk)

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Maldon District Council  
MDC Local Development Plan Preferred Options Consultation  
Princes Road  
Maldon  
Essex  
CM9 5DL

Dear Sir/Madam,

**Draft Local Development Plan 2014-2029 (MDCLDP)**

Much of the response below repeats comments made to the original proposed development plan of 2012.

Whilst the number of houses allocated to North Fambridge (strategic allocation) has been reduced to 75 there are still a number of outstanding issues. 75 additional houses in 5 years in North Fambridge is a proportional increase of 27%, too high an amount for a small village to integrate into the community. It is accepted that the village has to grow with the provision of appropriate housing for the needs of the village but this is not served by such a large rapid expansion.

North Fambridge has been included in the rural villages allocation but with a strategic allocation of 75 houses. The area of search in North Fambridge is wide and not clearly defined being within an 800m circle around the railway station excluding the flood zones 2 and 3. The consultation document specific to the rural villages allocation will not be available for consultation until late 2014 and adoption in late 2015. This makes it impossible for an in depth, educated response to be made to the MDCLDP. It also leaves North Fambridge in an invidious position until late 2015 in that development could take place piecemeal in any part of the area of search with no consistency of approach. North Fambridge has therefore not been afforded the possibility of consultation which will be granted to other rural settlements.

The Parish Council also wishes to raise the following objections to this consultation document on the basis of sustainability and deliverability:

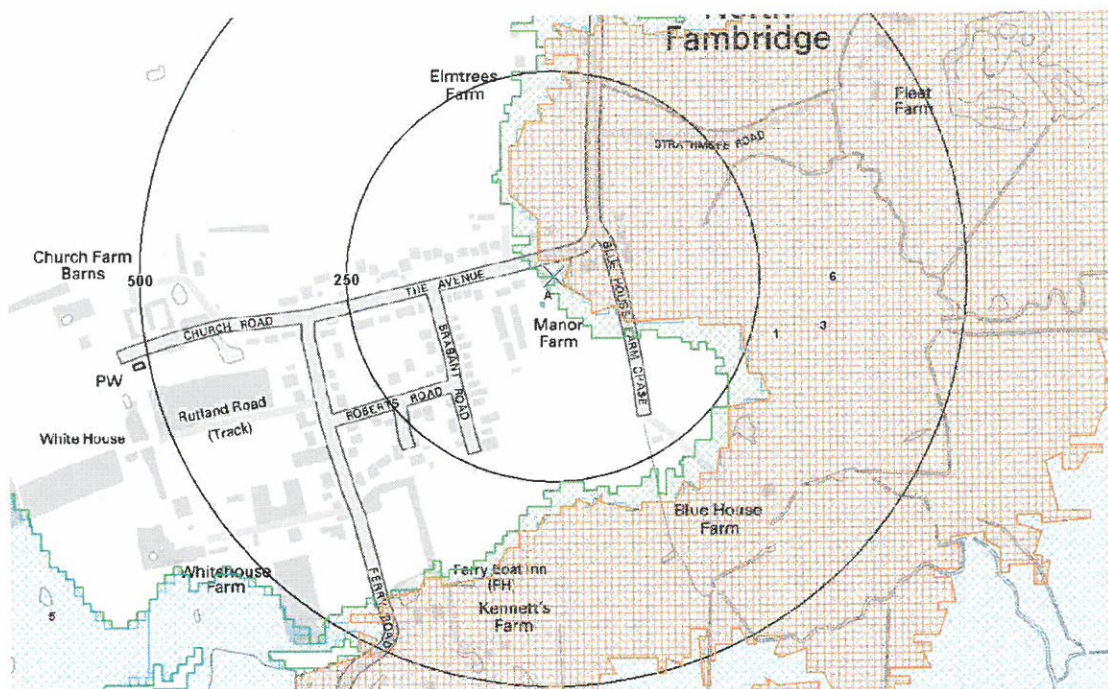
1. Sewerage System and Surface Water.

Sewerage:

The sewer infrastructure was installed in 1974 by Maldon District Council for 141 houses and included a 30% increase in housing (see MDC sewer plan 1974). Since that time sewer flooding has occurred at Franklin Road Pumping Station and the Avenue Pumping Station on a regular basis. In the 1980's records show that Anglian Water refused permission for a large development on two separate occasions. In recent years OFWAT placed Anglian Water on charge for not providing an adequate sewer infrastructure. New pumps have been installed at these two pumping stations but to no avail. Flooding still occurs as does backing up especially in Franklin Road. The Parish Council, Maldon District Council and Anglian Water have received recent complaints from residents concerning damage to property and backing up of the system. At times affected occupiers of properties in Franklin Road and Fambridge Road cannot use their toilets for fear of their overflowing with raw sewage. Further information has emerged from the Environment Agency relating to planning application OUT/MAL/13/00473 indicating that Latchingdon STW is at capacity with no spare capacity for growth. To increase the housing at North Fambridge would be contrary to the National Planning Policy framework paragraph 109.

Surface water:

North Fambridge is built on the alluvial plain of the River Crouch. The proposal will contradict National Planning Policy stating that development should be located away from areas at highest risk of flooding. It is difficult to envisage a village which has more areas subject to high risk of flooding (see map below showing part of them). The Parish Council would also like to bring to your attention the Environment Agency document on "Development and Flood Risk" 2012. North Fambridge has a high water table and therefore additional buildings and housing density will make the situation worse despite any SuDS provision which is constrained by the density of housing proposed- (see SuDS: Design and Adoption Guide ECC 2012). The Environment Agency Flood Risk Map shows that the village will be cut-off from the emergency services.



By building 75 properties on the areas which are not directly on the flood plain the risk of additional flooding will be forced on to those areas which are already at high risk i.e. parts of the Avenue, Fambridge Road, Blue House Chase, parts of Ferry Road and parts of Franklin Road. MDC/ECC have identified North Fambridge as having “vulnerable” sea defences – A Mid-Essex Strategic Flood Risk Assessment Report (Scott Wilson, 2008) specifically identifies North Fambridge as being at risk of flooding. Also note the report of June 2012 by TYM and Partners (Planners and Development Economists) which on Page 64 regarding the Sea Defences at North Fambridge on the River Crouch states “Current standard of the defences is below the minimum recommended standard of 1 in 200 years”. The report also states that the main areas considered at risk are those adjacent to the River Crouch (i.e. North Fambridge) and it is not yet clear how these issues will be addressed.

Environment Agency capital expenditure for the next 20/25 years has been curtailed (Source: Government Committee on Climate Change report 2012). Therefore no action will be taken to remedy this very serious situation. The Essex and Suffolk Shoreline Management Plan shows on Appendix 1 maps from the Management Plan that areas of North Fambridge to the east of the village will become vulnerable to flooding as the sea defences are realigned in 2055.

## 2. Highways/Transport.

According to 2.83 of the MDCLDP North Fambridge has been allocated 75 dwellings as it is more sustainable due to its proximity to South Woodham Ferrers, a railway station and proximity to a variety of employment and retail markets in South Essex. Access to employment and retail opportunities will rely on the use of cars, the least sustainable mode of transport, and causes the most congestion in South Woodham

Ferrers on the B1012. Most parishioners do not take the train to South Woodham Ferrers but rely on cars as the station is not located near the main shopping area. Use of the once a week shoppers bus is limited to those not constrained by employment and is not convenient for medical appointments. The village has a pub, a church, a children's nursery and playground and no other facilities. It is not a 'more sustainable location'.

North Fambridge has not been considered by Essex Highways in any of the assessments. It has been recognised by MDC in Appendix 3 of the MDC LDP Spatial Growth Scenarios and Strategic Site Allocations report that "the main access road to the village is narrow and meets the B1012 on a sharp bend. Forward visibility is very restricted and there appears to be minimal land available for suitable improvements. Traffic signals are not considered to be appropriate at this location as this would restrict the free flow of traffic on a main distributor route. The village also has limited facilities, so it may not be appropriate for significant additional development without better services and improved access from the B1012." The B1012 is an Accident Reduction Area. Despite this it is an ECC Heavy Goods Vehicle Route.

There is already heavy congestion on the B1012 at South Woodham Ferrers. Additional housing (450) in Burnham on Crouch, (1,830) in land south of Maldon will exacerbate this and a further 75 houses at North Fambridge will add to the problem, increasing the likelihood of serious accidents. There has been no impact assessment regarding this cumulative effect. The road into the village is very narrow in places and includes a narrow railway bridge where it is difficult to safely pass the many lorries which enter the village.

Additional housing in North Fambridge is not sustainable when considering the provision of transport. There is no regular bus service with one bus a week travelling to Chelmsford. The Dart service (an on demand service only) takes shoppers to South Woodham Ferrers once a week. Otherwise it will only take passengers to a nearby bus connection.

The train service is a branch line service and cannot be expanded as there is a shortage of "clearance times" and "capacity" on London Liverpool Street to Southend Line. There are hourly trains except for rush hour when there are two trains per hour. There are no late trains forcing many commuters to drive to Wickford instead of using North Fambridge.

### 3. Education.

The Parish Council cannot identify any feasibility carried out on pupil numbers. Latchingdon School is a faith school and not acceptable to some parents so should not be included in the consultation document as a feeder school. The primary feeder schools (Purleigh and Cold Norton) are over-subscribed and do not have scope for expansion as is the secondary feeder school (William de Ferrers), currently the preferred secondary school with pupils bussed from North Fambridge. The Ormiston River Academy is outside the catchment area. MDC identify "no choice"

for secondary education for residents in North Fambridge. MDC pupil numbers quoted are "questionable" as no source is provided.

#### 4. Employment.

MDC identifies that employment opportunities are limited in the district therefore mobility of labour is essential for seeking employment opportunities in Basildon, Chelmsford, Southend and Colchester and this would be totally dependent on a car. The development of 75 houses suggested by MDC is not sustainable. If working in London a season ticket now costs c. £4,000 pa. This would price low earners out of this option and is also not sustainable. No employment opportunities exist in North Fambridge apart from marina, public house, waste business and children's nursery. The local farms do not employ any labour. The employment opportunities that exist in Maldon are principally dependent on retailing, catering and the service industries. People living in North Fambridge cannot walk, cycle or catch a bus for work in Maldon. Placing housing away from employment is also not sustainable.

#### 5. Health.

MDC states that GP services in Maldon area are over-subscribed. The addition of 450 houses in Burnham and 1,830 in land south of Maldon will overstretch two of the catchment practices for North Fambridge and all the practices in South Woodham Ferrers (except for one which is already at capacity) have been required to accept additional patients due to the closure of one of the former practices.

In order to access the following you need a car:

- Dentist
- Chemist
- St Peters Hospital – no direct buses
- Broomfield Hospital
- Braintree Hospital
- Colchester Hospital (Cancer Patients)
- Basildon Hospital (Essex Cardiac Centre)

Development in North Fambridge is not sustainable from the perspective of health as access is virtually always by car. The above are the very facilities more frequently required by young families and the elderly.

## 6. Environment.

All of North Fambridge is identified by MDC as of Ecological Importance on Preferred Options Map 2012. No reference is made in the MDCLDP to the ancient woodland, with bats, in the northern part of North Fambridge. Likewise no reference is made of the impact of development on SSSI's and RAMSAR sites and Essex Wildlife Trust Blue House Farm. The National Planning Policy Framework 2012 makes reference to the coastal zone in that its value is to be protected. The MDCLDP makes no reference to ancient hedgerows that can be found in North Fambridge. No feasibility or environmental impact assessment can be found in the MDC document. The proposed development is in breach of NPPF Section 11 para 109 which states inter alia that "The planning system should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes, geological conservation interests and soils; recognising the wider benefits of ecosystem services; minimising impacts on biodiversity." The watercourse and present drainage system will be affected by the development of 75 houses. No mention is made of the impact on these in the documentation. The development of 75 houses will be on agricultural land. With a growing population in the UK land available for food production will be at a premium thus this development will be "damaging the needs for the future".

Recommendations were made in discussions with adjoining authorities that there should be a clear Planning Policy Guideline protecting the coastal belt. Policy N2 does not fulfil this purpose. It is difficult to see how the development proposals will benefit the SSI's and RAMSAR site in North Fambridge. Additional housing will be of detriment to these fragile sites merely by the increase of population accessing them.

## 7. Emergency Services

All the emergency services are now under pressure. Maldon Police Station is increasingly unmanned and all other stations are part-time. The police force is working on reduced budgets. The same applies to the fire service. The response times for the ambulance service have increased. With an increase in population and increased volume of traffic, demand for emergency services will only increase which could cause risk to life.

## 8. Housing demand.

Although a housing demand in the district has been identified it is not apparent from the MDCLDP how many additional residents wish to live in North Fambridge. All indications from statements made in planning applications suggest only a small number. In addition the Parish Plan shows that out of those responding (over 90% of the village) the largest number of recorded residents (738) are of the age group 25-59 (342) with 220 being under the age of 18. The remainder of those giving an age indication are between 60 and 85+ (164). These figures do not indicate a demand for smaller dwellings for an ageing population nor for young persons looking to get on the housing ladder (46 between the age of 18-24). Provision of such housing with

30% social housing would seem inappropriate and not based on an objectively assessed housing need for North Fambridge.

#### 9. Infrastructure.

North Fambridge has limited infrastructure, a Public House, Church, Village Hall (Capacity 90) and Children's Play Area. The village hall is identified as the emergency centre and refuge and would be insufficient for the occupants of 75 extra houses.

#### 10. Utilities.

North Fambridge has no mains gas supply nor are there any plans for piping gas into the village. Oil, Solid Fuel and Electricity are the primary sources of heating. Providing sustainable housing or small properties in the village would be difficult or expensive and thus unattractive to developers.

#### 11. Telecommunications

BT only has two cables into North Fambridge from the Latchingdon exchange and there are no plans for a fibre optic upgrade as it is not cost effective. Broadband is operating at 1-2MB at present with no future proposals for enhanced broadband. This means that opportunities to work from home via telecommunication and not use cars is nearly impossible. The implementation of proposed policy S7 (1) would be extremely difficult to implement.

#### Conclusion.

The proposed area, 800 metres from station, lies within an area where rural planning policies of restraint apply. The development of this area for housing is remote from community services and essential support facilities and is inaccessible by a range of transport so would represent an unsuitable form of development and would be contrary to the National Planning Policy Framework. The cost of putting in additional services would be prohibitive and unable to be met by CIL or s.106 agreements. Furthermore, the development of this rural site for new dwellings without adequate justification or special circumstances would fail to protect the intrinsic natural quality and beauty of an area of Ecological Importance, and thereby fails the principals of the National Planning Policy Framework. The allocation of 75 houses is contrary to Policy S7 in the MDCLDP as it does not reflect the size and character of the village concerned, its level of service provision, availability or potential for sustainable transport choices. It is not acceptable within the infrastructure of North Fambridge for the reasons set out in this submission.

Finally, in our submission the Parish Council wishes to state that Smart Planning will also submit objections for and on behalf of the Parish Council and the whole community of North Fambridge.

North Fambridge Parish Council request that Maldon District Council review their decision to include our village as an option for inclusion in the draft Local Development Plan and remove it before final submission for the reasons given above.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'C. Wakeling', with a small flourish at the end.

Christine Wakeling  
Clerk to the Parish Council