Land at Roman's Farm, south of Mill Road, Burnham on Crouch

Transport Objection on behalf of local residents

Railton TPC Ltd
41 York Road
Newbury
Berkshire RG14 7NJ

Railton TPC Ltd ref:	Burnham-on-Crouch 01E
Planning Inspectorate	Ref: N/A
Planning Authority	Ref: 25/00840/OUTM
Date:	January 2026
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Appendices

1 INTRODUCTION

1.1 Railton TPC Ltd has been commissioned by Burnham Against Non-sustainable Development' (BAND), that represents local residents, to review transport information submitted in support of a planning application for up to 200 dwellings on land at Roman's Farm, south of Mill Road, Burnham-on-Crouch (Maldon District Council (MDC) planning application ref. 25/00840/OUTM).

1.2 The author is Director of Railton TPC Ltd who has worked for 35 years in the transport planning industry. He is a member of the Chartered Institution of Highways and Transportation (MCIHT). He has dealt with highways and transport matters for a wide range of development types from local to strategic scale. He has given evidence at informal hearings and public inquiries, participated in Local Plan Inquiries and examinations of Nationally Significant Infrastructure Projects (NSIPs).

1.3 The author has visited the site and surrounding transport networks and has met with local residents to discuss their transport concerns.

1.4 The site is not allocated in the Maldon District Council Development Plan (Approved Local Development Plan 2014-2029, Maldon District Council, July 2017). MDC is in the process of reviewing and updating the Development Plan.

1.5 The main documents reviewed comprise the following:

- Transport Assessment (TA), iTransport, August 2025;
- Framework Travel Plan (FTP), iTransport, August 2025.

1.6 The applicant submitted a pre-application Scoping Note (iTransport, February 2024) to Essex County Council Highways Authority (ECCHA). This Scoping Note identified a potential development of between 135 and 150 dwellings. A meeting between ECCHA and the applicant was held in May 2025 to discuss the scope of transport work. ECCHA provided pre-application advice with regard to a 200 dwelling development in June 2025. Details of these discussions are attached as Appendices A-C of the TA. The content of these discussions is taken into account in this review.

1.7 The following sections are included:

1. Introduction
2. Access for Pedestrians and Vulnerable Highway Users
3. Access to Bus Services
4. Active Travel England Toolkit and Checklist

5. Safety of Proposed Access Arrangements
6. Impact on B1021/B1010 Junction
7. Impact on Green Lane
8. Summary and Conclusion

1.8 The site and the surrounding transport networks are shown on **Figure 1**.

2 ACCESS FOR PEDESTRIANS AND VULNERABLE HIGHWAY USERS

Standard of Mill Road

2.1 The TA, at paragraph 4.5.1, states that the width of Mill Road varies between 3.8m and 5.1m between Southminster Road and Roman's Farm Chase (a length of around 335m). Measurements undertaken on site reveal the majority of this section of road is less than 4.5m in width. A width of at least 4.1m is required to allow two cars to pass (and then only at very slow speed) and a width of at least 4.8m to allow a car to pass an HGV[1]. The edge of the carriageway on the southern side of the road is bounded, in places, by fences, walls and telegraph poles. Vehicles must therefore allow for some margin of clearance on this side of the road or risk collision with roadside structures.

2.2 Paragraph 4.3.1 of the TA states that a continuous footway is provided along the northern side of Mill Road that is '*generally a minimum width of 1.5m wide*'. Measurements on site reveal that the width of the footway varies considerably. At its narrowest it is 0.9m in width and significant sections are less than 1.5m in width. The presence of telegraph poles further constrains the footway width in places. It would be impossible for a wheelchair user to travel the length of this section of Mill Road on the footway since an absolute minimum of 1.0m is required to allow a wheelchair to pass.

2.3 The significance of these limitations is emphasised by reference to Section 4.2 of the DfT's *Inclusive Mobility: A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure*:

> '*Footways and footpaths should be made as wide as is practicable, but under normal circumstances, a width of **2000mm** is the minimum that should be provided, as this allows enough space for two wheelchair users to pass, even if they are using larger electric mobility scooters. If this is not feasible due to physical constraints, then a minimum width of **1500mm** could be regarded as the minimum acceptable under most circumstances, as this should enable a wheelchair user and a walker to pass each other. Where there is an obstacle, such as lamp columns, sign posts or electric vehicle charging points, the absolute minimum width should be **1000mm**, but the maximum length of such a restricted space should be **6 metres**'*. (Section 4.2, Inclusive Mobility Guide, DfT, December 2021)

2.4 The Road footway fails to meet these standards in that it is not 2m in width, it does not meet the minimum standard of 1.5m over significant sections and parts even fall below the ***absolute*** minimum width of 1.0m.

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1 See Figure 7.1 of Manual for Streets (MfS), Department for Transport (DfT), 2007

2.5 Mill Road currently provides access to 141 dwellings on Mill Road and Stoney Hills.

2.6 The Essex Design Guide includes a Street Type Table[2] that describes an access road (serving up to 200 units) as having a width of 5.5m and 2 x 2m footways. The standard of Mill Road falls short of the Design Guide Standard in terms of its width, the number of footways provided and the width of the footway provided. Given that Mill Road is already of an insufficient standard to accommodate the number of dwellings served, it is not acceptable to propose more than a doubling of the number of dwellings that depend upon it for vehicular access. No highway land is available to allow Mill Road and its footway to be widened to meet standards.

Provision for Vulnerable Highway Users on Mill Road

2.7 Paragraph 115 of the National Planning Policy Framework (NPPF) states that, '*In assessing* […] *specific applications for development, it should be ensured that:* […] *b) safe and suitable access to the site can be achieved for all users*'. It is therefore required that the needs of all highway users should be considered when providing access to a site. '*All users*' include *vulnerable* highway users and vulnerable highway users include groups such as school children and those with mobility impairments. The Institute of Environmental Management and Assessment (IEMA) Guidelines: Environmental Assessment of Traffic and Movement (IEMA, July 2023) defines vulnerable groups as, '*young age; older age; income; health status; social disadvantage; and access and geographical factors*' (para. 1.30). In the context of the current application, school children would constitute an important category of vulnerable highway users due to the proximity of the primary school, but consideration also needs to be given to other vulnerable groups, both within the proposed development and existing users of the local transport networks.

2.8 The limited width of Mill Road means that when drivers park on the road, they generally park partially on the footway to allow sufficient space for vehicles to pass. The applicant presents the results of 21 parking surveys undertaken on a Monday, Wednesday, Friday and Saturday (see Appendix E of TA). Every survey recorded between 5 and 7 vehicles parking partially on the carriageway and partially on the footway. Observations on site confirm that in many instances the available width of footway is insufficient to accommodate a single pedestrian. In all cases it would be impossible for a parent with a pram or buggy or a person in a wheelchair to use the remaining footway.

2.9 Existing vulnerable highway users are therefore forced to use the carriageway.

2 https://www.essexdesignguide.co.uk/design-details/highways-technical-manual/street-type-table/

2.10 The TA proposes no measures to mitigate the adverse highway safety impacts of increasing both pedestrian and vehicle movements along Mill Road. A number of footway improvements are identified in paragraph 6.6.2 of the TA but none of these relate to pedestrian movements along Mill Road, the primary pedestrian access serving the site and one that already falls well short of safe standards.

Provision for Vulnerable Highway Users on Footpath 14

2.11 The public right of way that links Mill Road with Marsh Road (see **Figure 1**) provides an alternative route for some pedestrians accessing facilities to the south. The existing footpath is not suitable for many users since the surface is poor in places, it is gated, unlit and it crosses a narrow bridge over a stream:

Photo1: Gate on Footpath 14

Photo 2: Narrow Bridge on Footpath 14

Photo 3: Unsurfaced Section of Footpath 14 South of Bridge

2.12 The applicant proposes a financial contribution to improve this right of way but no work has been undertaken to demonstrate that improvements are possible given maintenance responsibilities, landscape and potential ecological impacts. It is unlikely that the right of way would be permitted to be 'urbanised' by formalising the width and surface and providing street lighting. This route would be unlikely to safely cater for those vulnerable highway users who would be unable to use the constrained facilities along Mill Road. It would not provide a route to those facilities such as bus stops and the farm shop close to the Mill Road/Southminster Road junction.

2.13 It is noted that the section of the footpath south of the bridge, adjacent to the Land north of Marsh Road development (application ref. MAL/19/01208/FUL) (shown above in **Photo 3**) should have been upgraded before first occupation of the development. It appears that this work has not been undertaken. The reason for this is not known but it casts further doubt on the feasibility of implementing significant changes to this footpath

Emergency and Service Vehicle Access

2.14 The TA includes the following paragraph relating to emergency access:

> '*The local fire officer at with Essex County Fire and Rescue Service has been consulted with in relation to response time requirements for emergency vehicles if a development of 200 dwellings is served from a single point of access via Mill Road. They have stated that providing the internal site layout achieves the required access requirements for fire appliances as set out in Approved Document B of the Building Regulations are met then the Fire Authority are satisfied the necessary requirements are met and has raised no issues in terms of emergency vehicles accessing the site*'. (TA para. 5.3.9)

2.15 The applicant fails to provide any details of the discussions with the Fire and Rescue Service and scrutiny of the planning portal reveals no responses from the Fire and Rescue Service. It is unclear what information was provided to the Service. The response appears to suggest that the scope of the response may have been limited to the internal design of the development rather than potential problems accessing the site along Mill Road. It has not, therefore, been demonstrated that the emergency services have no concerns about building a significant development with a single point of access that falls short of width standards.

2.16 The TA includes drawings that purport to show that large vehicles such as refuse vehicles and emergency vehicles are able to access the site via Mill Road when cars are parked. The drawings appear to assume that all cars are parked partially on the footways. The issue that needs to be assessed is whether refuse and emergency vehicles would be able to access the site if cars were parked on the carriageway. Without this information it is not possible to determine whether the site would be accessible to service and emergency vehicles without prejudicing the safety of vulnerable highway users.

2.17 It is not only cars that park on Mill Road. Although the parking surveys observed only cars, there are instances when vans and larger vehicles park along the road. A review of the photographic records within Google Maps reveals at least one larger van obstructing the whole of the footway. BAND is able to provide many examples of vehicle conflicts along this section of Mill Road.

Street Lighting

2.18 There is currently very limited street lighting on Mill Road. This will both deter walking and cycling and will increase the risk to pedestrians forced to walk on the carriageway because of the vehicles parked on the footway.

2.19 As explained above, no street lighting is currently provided along the other potential pedestrian route into Burnham-on-Crouch via Roman's Farm Chase and Footpath 14. There is therefore no route for pedestrians between the site and local facilities with standard street lighting. This undermines the applicant's strategy to encourage movements by sustainable modes and is contrary to Paragraph 115 of the NPPF (see above).

2.20 There is therefore no route for pedestrians between the site and local facilities with standard levels of street lighting. The applicant proposes no improvement to street lighting along either Mill Road or along Roman's Farm Chase.

Proposed Off-Site Improvements

2.21 Section 6.6 of the TA sets out a number of improvements to off-site footways and pedestrian crossing points that are purported to be based on a walking and cycling audit of the routes between the site and key off-site facilities.

2.22 The audit and the proposed improvements ignore Mill Road. Given the existing and likely future constraints along Footpath 14, Mill Road is the main link for all pedestrian and cycle movements to and from the site. As described above, the link is almost always impassable for pedestrians and vulnerable highway users without them being forced to walk or use the main carriageway of Mill Road. ***It is entirely unacceptable that access to and from a site of up to 200 dwellings relies upon pedestrians and vulnerable highway users sharing a carriageway with vehicles***, particularly if the link is also used by vehicles already generated by 141 dwellings.

Conclusion on Pedestrians and Vulnerable Highway User Access

2.23 It is concluded that Mill Road constitutes a sub-standard access and the proposed development exacerbates existing adverse safety impacts on all users of Mill Road; both vehicular and vulnerable highway users. The proposed development also prejudices the safety of all of those that rely or would rely on Mill Road for emergency access. Despite the obvious deficiencies of Mill Road, no improvements are proposed. The lack of any additional highway land along Mill Road precludes the possibility of widening the existing carriageway and footway.

3 ACCESS TO BUS SERVICES

3.1 Paragraph 4.4.1 of the TA states that, '*The closest bus stops to the site are located on Southminster Road circa 550-600m to the west, from the centre of the site*'. The centre of the site is over 600m from the closest bus stop on Southminster Road. A *maximum* distance that is conventionally viewed as encouraging bus use is 400m. The Essex Design Guide states, '*Stops should be provided at key intersections within the local pedestrian network, so as to comply with ECC policy that all new homes are located within 400m actual walking distance of a bus stop*'[3]. The proposed development fails to comply with ECC policy with regard to bus access.

3.2 It should be noted that the 400m walk distance to a bus stop is not only a matter of convenience; a minority of people are physically unable to walk significant distances to access public transport. The applicant states that the existing bus stops would be improved by providing '*raised kerbs* […] *to be fully accessible for disabled people*' (para. 6.6.7) but omits to consider how such people would get to the bus stop from the site in the first place or to safely cross Southminster Road when walking to or from the northbound bus stop[4].

3.3 The route to and from the nearest bus stops includes Mill Road that does not provide a suitable route for pedestrians since it is poorly lit, has narrow footways in places and these footways are often obstructed by parked vehicles due to the narrowness of the carriageway (see above).

3.4 A Planning Inspector considering an Appeal[5] regarding a proposed development of 8 dwellings at Roman's Farm, accessed via Roman's Farm Chase (a similar distance from the Southminster Road bus stop) stated:

> *'The nearest bus stops are in excess of 500m from the site on Southminster Road. I have not been made aware of any local facilities or services within a reasonable walking distance of the site. As such, it has not been adequately shown that the site is well located for sustainable travel. Overall therefore, I find that the appeal proposal would not be suitably and sustainably located and would conflict with LP Policies S1, S8, D1 and H4. Nor would it accord with Framework paragraph 105* [paragraph 110 in latest version of NPPF] *insofar as it requires patterns of growth to support sustainable travel'.* (para. 12 of Appeal Decision)

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3 See https://www.essexdesignguide.co.uk/design-details/streets-and-roads/designing-streets-in-support-of-buses/

4 The applicant proposes to introduce dropped kerbs either side of Southminster Road but pedestrians are still required to cross the entire width of the road.

5 Appeal Ref: APP/X1545/W/21/3267306

3.5 It is concluded that the proposed development fails to provide adequate access to bus services and thus fails to comply with ECC policy.

4 ACTIVE TRAVEL ENGLAND TOOLKIT AND CHECKLIST

4.1 Table 6.6 of the TA sets out a summary of the application of the Active Travel England (ATE) Checklist review. Details of the review are set out in Appendix J of the TA. Scrutiny of the assessment that has been undertaken reveals numerous flaws and inconsistencies including the following:

- **Local Amenities:** The criterion requires that '*there are a sufficient number and range of essential local facilities within an 800m (10 minute) walking distance*'. The applicant states that the proposed development meets this criterion but the applicant's own data set out in Table 6.3 of the TA shows only the primary school and farm shop to be within 800m of the site. The applicant's conclusion is not justifiable;
- **Walking route to primary school (width):** The route does not meet the standard of 2.0m (with limited pinch points of 1.5m due to street furniture). It has not been demonstrated that the route could be upgraded to meet this criterion;
- **Walking route to primary school (surface)**: The existing surface is not smooth and even and it has not been demonstrated that such a surface could be provided;
- **Walking route to primary school (lighting)**: There is no route that is street lit and the applicant has not demonstrated that lighting could be provided in this location;
- **Walking route to food shop (and other facilities)**: The applicant suggests that the route to the Co-Op store would meet the minimum criteria along its entire length but no improvements have been identified for Mill Road and none are possible. As described above, the route along Mill Road is poorly lit, is well below 1.5m in places, does not have a smooth, even surface and is not step free since the footway is regularly obstructed by parked vehicles due to the narrowness of the carriageway and pedestrians are forced to walk within the carriageway in places. The development therefore fails this criterion and a condition or financial contribution will not overcome the problem;
- **Suitability for walking and wheeling**: The applicant states that, '*There are no unaccessible* [sic] *areas along the walking routes that will hinder inclusive mobility in terms of gradients*'. The applicant ignores the problems with lack of lighting and inaccessible and narrow footways along Mill Road and therefore misrepresents the site's credentials in relation to this criterion;
- **Cycle routes**: It is stated that Local Transport Note 1/20 (LTN 1/20) and Manual for Streets criteria for on-carriageway cycling are met due to low vehicle flows yet

Southminster Road south of Mill Road carries around 800 vehicles in the peak hours (one vehicle every 5 seconds on average). To the south and on the B1021 traffic flows are even higher;

- **Walking routes to nearest transport nodes**: The applicant states that it is a 'short' walking distance to the nearest bus stops yet the distance is in excess of 400m. The route also suffers from the deficiencies in the walking route along Mill Road that have been described above;
- **Access and provision of public transport**: This criterion explicitly cites the requirement for the development to be within 400m of a bus stop. The applicant states that all dwellings are within 600m of a bus stop (this is incorrect - see above) yet still concludes that the site meets this criterion. It does not;
- **Through traffic**: The criterion seeks to deter through traffic since this would increase risk to vulnerable highway users within the development and discourage pedestrian movement more generally. The proposed development actively seeks to encourage through traffic. Despite the adverse impacts of non-development traffic passing through the site, the applicant does not consider the potential adverse impacts.

4.2 Scrutiny of the ATE checklist and the applicant's failure to properly consider the points raised serves to highlight many of the deficiencies of the site that have been described above, particularly the poor access to public transport, the lack of facilities within convenient walking distance and the poor quality of the walking routes along Mill Road and footpath 14.

5 SAFETY OF PROPOSED ACCESS ARRANGEMENTS

Summary of Proposed Vehicle Access Strategy

5.1 It is proposed to provide vehicle access for the site by extending Mill Road to the east and north, through the site, to form a new priority junction with Stoney Hills. The extension of Mill Road will lead to the formation of a new priority junction where the former northern arm of Mill Road forms a priority junction with the section of Mill Road extended to the east. The arrangement would also alter the junction between Roman's Farm Chase and Mill Road. Off-site improvements are also proposed at the Mill Road/Green Lane/Southminster Road junction.

5.2 A Stage 1 Road Safety Audit has been undertaken for the proposed access arrangements. This forms Appendix G of the TA.

5.3 These elements of the access strategy are considered in turn.

Mill Road Left-Right Staggered Junction (Site Access)

Loss of Passing Place on Mill Road

5.4 The extension of the east-west section of Mill Road into the proposed site leads to the loss of the existing widened area at the bend on Mill Road where vehicles are currently able to pass each other. This matter was raised by a Planning Inspector considering an Appeal[6] regarding a proposed development of 8 dwellings at Roman's Farm, accessed via Roman's Farm Chase.

5.5 The Inspector stated, '*Considerable local concern has been expressed regarding congestion along Mill Lane* [sic]. *This is the only route from the site to the wider highway network. I saw on the visit that this road is narrow and subject to on-street parking which inhibits the free movement of traffic*' (para. 16 of Appeal Decision).

5.6 The Inspector went on to raise concerns about the adverse highway safety impact of the potential loss of the existing vehicle passing opportunity at the bend on Mill Road where Roman's Farm Chase forms an access. The current proposal also removes this passing opportunity so that any vehicle arriving at the new priority give-way line at the southern end of the section of Mill Road to the north of the junction would be unable to pass a vehicle turning into this section of Mill Road without obstructing the access into the proposed new development.

5.7 It follows that the current application suffers from one of the key concerns raised by the Inspector at a previous Inquiry that led to the Inspector dismissing the Appeal.

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6 Appeal Ref: APP/X1545/W/21/3267306

Substandard Visibility

5.8 The proposed development extends the existing east-west straight section of Mill Road further to the east. At present all vehicles travelling along the existing section of Mill Road are forced to slow down to negotiate the sharp blind bend. The proposed development introduces a further straight section of carriageway, around 80m in length, before the first bend within the development[7]. This will have the effect of increasing vehicle speeds along the eastern section of Mill Road.

5.9 The site access plan attached to the TA (i-Transport Drawing No. ITB19373-GA-005 rev. D) shows visibility splays of 35m from a point 2.0m back from the new give-way line at the junction of the north-south section of Mill Road with the east-west section of Mill Road. A visibility of 35m is appropriate when vehicle speeds are around 25mph. It is possible that vehicle speeds in this area could be greater than this given the straight alignment of Mill Road.

5.10 Visibility at the new junction with the existing north-south section of Mill Road is taken from a point 2.0m back from the give-way line (X distance). A minimum X distance of 2.0m is appropriate for 'direct accesses'. The existing section of Mill Road to the north of the junction does not constitute a 'direct access'. The north-south section of Mill Road will still provide access to seven properties and will remain a possible route to be taken by drivers travelling to and from at least 70 dwellings around Stoney Hills. The appropriate X distance is therefore 2.4m[8]. The appropriate achievable visibility along Mill Road and the site access road should therefore be less than 35m.

5.11 A further problem with the proposed visibility is that it is measured to an off-set of 1.0m from the nearside edge of carriageway. It is possible that a cyclist (or even a motorcyclist) would not be seen if approaching within 1.0m of the kerb.

5.12 It is concluded that the visibility at the proposed new priority junction of the north-south section of Mill Road with the east-west section and site access road does not meet standards and will therefore introduce adverse highway safety risks to highway users.

Mill Road/Stoney Hills Priority Junction

5.13 The proposed junction of the internal access road with Mill Road/Stoney Hills at the northern edge of the proposed development is located at the only passing place on the southern side of the section of Mill Road that runs along the northern edge of the proposed development. It is likely that some vehicles using this section of Mill Road

7 See Illustrative Masterplan, Drawing No. TOR-SK001, Tor and Co. 25/07/2025

8 See para. 3.8 of CD 123 Rev 1 (Design Manual for Roads and Bridges, Highways England et al January 2020)

would use the bell-mouth of the new site access road junction as a passing opportunity. This would constitute a highway safety concern as vehicles may pull into the path of other vehicles travelling north towards the junction on the site's internal access road.

5.14 It is noted that the swept paths presented for this junction include a refuse vehicle only making the left turn into the site. Refuse vehicles and other large vehicles would also make the right turn into the site and the right and left turns out of the site. It has not been demonstrated that these movements can be undertaken safely without encroaching on third party land or conflicting with vehicles using the site access road. It is, for example, likely that a large vehicle would be unable to turn right into the site without conflicting with a vehicle waiting at the site access give-way line.

5.15 It is noted that the Stage 1 Road Safety Audit attached as Appendix G of the TA identifies a concern regarding vehicle conflicts along Mill Road between the site access northern junction and Stoney Hills. The Designer's Response refers to the swept path analysis attached to the TA (i-Transport Drawing ITB19373_GA-013) suggesting that it demonstrates that all manoeuvres can be undertaken safely. This statement is incorrect since only one swept path involving a larger vehicle is presented (see above).

5.16 It is concluded that it has not been demonstrated that the Mill Road/Stoney Hills Priority junction is safe.

Southminster Road/Mill Road/Green Lane Junction

5.17 Existing visibility at the Mill Road/Southminster Road junction is extremely poor. The following photograph shows the visibility to the left from a point 2.4m back from the give-way line:

Photo 4: Visibility Looking Left from Mill Road at Southminster Road

5.18 The existing visibility distance, measured on site is 30.0m. The author noted that in order to position a car so that it is possible to achieve sufficient visibility to the left to be able to pull out with some confidence that no vehicle is approaching from the south, it is necessary to edge beyond the existing give-way line, potentially into the path of southbound vehicles. This is an extremely hazardous arrangement.

5.19 It is entirely unacceptable to significantly increase the use of the existing highly substandard junction for highway safety reasons. The applicant has explored options for improving the safety of this junction. The current proposals are shown in the drawing attached as **Appendix 1**.

5.20 It is proposed to move the existing Mill Road give-way line to the west so that drivers waiting on Mill Road would have improved visibility to the left. This also has the effect of reducing the width of Southminster Road at the junction. It is proposed to adjust the alignment of Southminster Road in the vicinity of the junction by moving the carriageway north of the junction slightly to the west and moving the carriageway south of the junction slightly to the east. This has the effect of slightly 'smoothing out' the right-left bends in the road at this point. It is also proposed to introduce two road narrowings south of the junction to force vehicles to slow and give way and one road narrowing north of the junction. These traffic calming features would be entirely out of character with the remainder of Southminster Road.

5.21 The 'smoothing of the bends would normally lead to an increase in vehicle speeds along this section of Southminster Road. Roads are generally widened at bends to accommodate the swept paths of larger vehicles. In this instance it is proposed to ***narrow*** the road where vehicles are negotiating the two bends. In these respects the proposals are contrived and reflect the problem of trying to overcome the severe visibility constraint caused by the presence of the building south of the Mill Road give-way line.

5.22 It is noted that the current proposals are the result of an initial scheme that was subject to a Stage 1 Road Safety Audit (RSA1) (Appendix G of the TA) that identified a number of problems and made a number of recommendations. The amended proposal has not been subjected to any further assessment in relation to highway safety.

5.23 The current proposals raise a number of concerns:

- There has been no assessment made of the potential of these features to lead to significant vehicle delays, particularly during peak hours and during the period when parents are picking up from the local secondary school just to the south;
- The proposals have the effect of narrowing the width of carriageway through the bends (the give-way line at Mill Road is moved into the carriageway and the give-

way line at Green Lane remains in the same location). Observations on site reveal that many vehicles, particularly approaching from the south, over-run the centre line of the road while negotiating the first right hand bend. The narrowing of the carriageway will exacerbate the risks of head-on or side swipe collisions in this area;

- The applicant presents swept paths of large vehicles passing each other on Southminster Road at the junction (Drawings ITB19373-GA-014, ITB19373-GA-016 and ITB19373-GA-017). These show large vehicles passing extremely close to each other, if not colliding, through the junction and over-running the edge of the carriageway south of Green Lane. The swept paths do not provide assurance that the narrowing of the carriageway through the junction will not lead to highway safety problems;
- The applicant shows sub-standard visibility to the left for vehicles emerging from Green Lane. A note on the drawing states that visibility is unchanged from the existing situation. This is not correct since the road narrowing to the north of the junction forces southbound vehicles to swerve onto the western side of the carriageway, effectively reducing the extent to which drivers waiting at the Green Lane give-way line are able to see approaching vehicles;
- South of the junction, vehicles approaching from the south are required to give way to vehicles approaching from the north at both the road narrowings. It is not clear whether a driver approaching from the south has sufficient forward visibility around the bend to be able to judge whether they can pass through the two narrowing before meeting an oncoming vehicle. If this visibility is not available, this could lead to head-on collisions as southbound drivers will expect priority.

5.24 It is concluded that the proposed amendments to the Southminster Road/Mill Road/Green Lane junction are contrived, do not appear to be safe for larger vehicles and may lack sufficient forward visibility for northbound drivers to avoid head-on conflicts close to the junction.

6 IMPACT ON B1021/B1010 JUNCTION

6.1 The assessments set out in the TA indicate that the existing B1021 Church Road/B1010 Maldon Road junction is currently operating close to capacity in the PM peak hour with significant delays (127 seconds) for vehicles approaching the junction from the west on the B1010. The modelling results set out in Table 7.6 of the TA suggest that the junction operates over capacity in 2030 without development (256 second delay) and further over capacity with the proposed development (283 second delay). The development therefore leads to an increase in delay on this arm of the junction of 27 seconds.

6.2 The TA concludes that the impact of the increase in delay is not 'severe' in relation to planning policy that the TA suggests, '*sets a very high bar for preventing development from coming forward for transport reasons*' (TA, para. 7.6.10). It is, however, the case, that there is no absolute definition of 'severe' and judgement needs to be used in individual cases.

6.3 The fact that a junction operates over capacity with queues and delays before traffic associated with a proposed development is added does not diminish the significance of the additional traffic. Given that additional delays are not only experienced by drivers associated with the new development but also by all existing drivers means that impacts become relatively more significant as a junction reaches and exceeds capacity. Not only do overall delays increase, but other adverse impacts such as vehicle emissions and noise are increased.

6.4 In the situation described in the TA, congestion at the B1021/B1010 junction has a further adverse impact in that it is likely to lead to increased use of Green Lane to access destinations to the west as drivers seek to avoid delays at the B1021/B1010 junction. This impact is discussed in the following section.

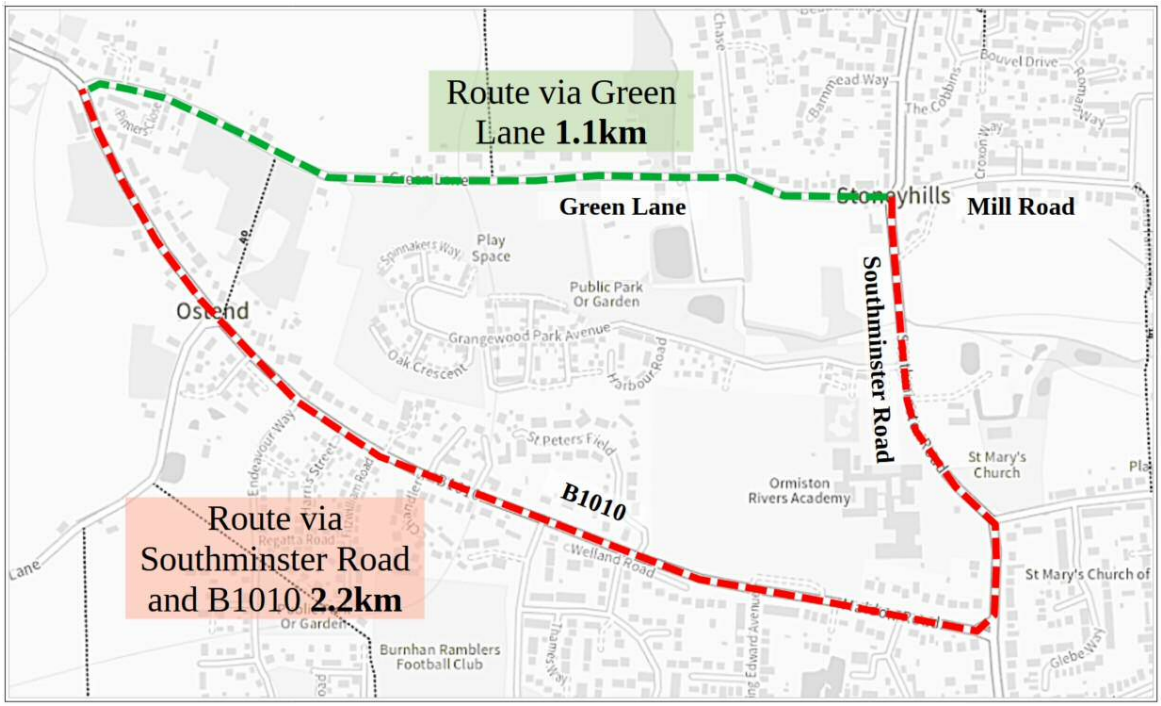
7 IMPACT ON GREEN LANE

7.1 Green Lane forms the western arm of the junction where Mill Road connects to Southminster Road. Green Lane is a narrow, unlit country lane with no footways. Its width is generally less than 4.0m, insufficient to allow two cars to pass. It includes several tight bends that restrict forward visibility. There are no formal passing places so vehicles must use driveways and localised widening to allow other vehicles to pass. The lane provides access to around 25 properties.

7.2 Public rights of way connect to Green Lane from both the north and south. Sections of the road are therefore used by residents living on the road and by other local residents to access these rights of way either for recreational purposes or as part of the route to local facilities. Any significant increase in the use of Green Lane would lead to adverse highway safety impacts in relation to these vulnerable highway users.

7.3 Drivers wishing to travel between the proposed site and areas to the west are able to do so by crossing between Mill Road and Green Lane rather than using the route comprising Southminster Road and the B1010. The route along Green Lane from the Southminster Road junction to the B1010 is 1.1km in length and the route via Southminster Road is 2.2km in length:

Plan 1: Alternative Routes to/from West



7.4 As explained in the previous section, the B1021/B1010 junction currently experiences delays, particularly in the PM peak hour and these delays are predicted to increase in the future assessment year (2030) and increase further with the addition of traffic associated with the proposed development. Green Lane therefore not only offers advantages in terms of a shorter journey distance but also allows delays at the B1021/B1010 junction to be bypassed. The time saving achieved by using the Green Lane route will increase as time goes on and with the addition of development traffic.

7.5 The applicant calculates that 52% of development traffic would be to and from the west via the B1010 Maldon Road (see Figure TF3). In the AM peak this constitutes 53 vehicle movements (Figure TF4) and in the PM peak, 49 vehicle movements.

7.6 The TA presents a sensitivity assessment whereby the level of development traffic using Green Lane mirrors the existing observed movements between Mill Road and Green Lane (i.e. assuming that future residents of Mill Road behave in the same way as existing residents of Mill Road). The TA concludes that if this were to happen it would '*not result in a material or adverse impact on the operation of Green Lane, or the junctions onto the B1010 Maldon Road and B1021 Southminster Road at either end*' (TA, para. 7.7.4). Although the applicant does not present percentage impacts, development traffic, in this situation, would constitute a 19% increase on Green Lane in the AM peak and a 28% increase in the PM peak.

7.7 It is suggested that an increase less than 30% falls below the 30% threshold for assessing transport environmental impact. This is incorrect since for highway links with high sensitivity, the threshold is 10%[9]. Green Lane is a sensitive link since it provides access to numerous properties, it does not have footways, it is unlit and narrow with blind bends.

7.8 On the basis of the applicant's sensitivity test the proposed development has the potential to lead to unacceptable adverse transport environmental impacts (highway safety, pedestrian amenity, community severance).

7.9 It is highly likely that the use of Green Lane will increase in the future as delays at the B1021/B1010 junction increase. Traffic associated with the proposed development would not only travel along Green Lane, but the increased delays at the B1021/B1010 junction resulting from the proposed development will increase the number of ***existing*** drivers who would seek to rat-run along Green Lane.

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9 See Rule 2 set out in The Institute of Environmental Management and Assessment (IEMA) Guidelines: Environmental Assessment of Traffic and Movement (IEMA, July 2023).

7.10 Despite there being strong evidence to suggest that the proposed development will lead to an adverse impact on Green Lane, the applicant offers no mitigation.

8 CONSTRUCTION ACCESS

8.1 The only route available for construction vehicles is Mill Road. As has been explained above, Mill Road is entirely unsuitable to accommodate any significant increase in ***light*** vehicle movements. Heavy vehicles would be unable to pass each other and would be unable to pass light vehicles on Mill Road. The use of the road by construction traffic would force more vehicles to park on the footways and therefore lead to more pedestrians and vulnerable highway users walking within the carriageway.

8.2 Footpath 14 and Mill Road are used by many parents and children accessing the primary school to the south. Construction traffic would pose a threat to these vulnerable highway users.

8.3 Construction activities would not be limited to a short period. It is likely that the construction period would last over 2 years. There have been new dwellings constructed around Stoney Hills over recent years but these have been small, intermittent projects spread over a long period of time and have generated relatively low levels of construction traffic. The proposed development is of a much greater magnitude than these individual schemes, more than doubling the ***total*** amount of development in the area. It will generate significant numbers of construction HGVs continuously over a long period.

8.4 Continuous construction traffic at relatively high levels would have a significant adverse impact in terms of pedestrian amenity and community severance. Local residents would be deterred from making journeys on foot and by bicycle for the duration of the construction period. The fear and intimidation caused by HGVs travelling along a narrow residential street with narrow (or impassable) footways is very significant. Construction HGVs would constitute a very substantial percentage uplift in heavy vehicle traffic on this quiet residential road for a long period. An assessment of transport environmental impact would find both a major increase in the magnitude of HGV movements in an area with high sensitivity[10] (footways narrow or absent and constrained carriageways in areas used by vulnerable highway users). This would constitute a very substantial adverse impact and one that would necessitate effective mitigation.

8.5 It would not be possible to properly mitigate the significant adverse highway safety impacts through the implementation of a Construction Traffic Management Plan (CTMP). It is not, therefore, acceptable to assume that highway safety issues can be satisfactorily mitigated through measures yet to be determined.

10 See The Institute of Environmental Management and Assessment (IEMA) Guidelines: Environmental Assessment of Traffic and Movement (IEMA, July 2023)

8.6 The significant adverse highway safety and amenity impacts of construction traffic constitute a justifiable reason to refuse this application.

9 SUMMARY AND CONCLUSION

9.1 This report reviews transport information submitted in support of a planning application for up to 200 dwellings on land at Roman's Farm, south of Mill Road, Burnham-on-Crouch.

9.2 The proposed development relies, for access, on the section of Mill Road between the site and Southminster Road. The width of Mill Road is less than 4.5m in places, insufficient to allow a car to pass a large vehicle. It is significantly less than the Essex Design Guide standard for a road serving developments up to 200 dwellings (5.5m).

9.3 A footway is provided on the northern side of Mill Road but sections are less than 1.5m in width and, at its narrowest, it is 0.9m in width. It would be impossible for someone in a wheelchair or someone with a double buggy to use this footway.

9.4 Mill Road is very poorly lit and the applicant proposes no improvement to street lighting.

9.5 The applicant proposes a number of off-site highways and footway improvements but no improvements are proposed for Mill Road, the site's only link to the external highway network. The lack of any additional highway land along Mill Road makes it impossible to widen the existing carriageway and footway.

9.6 The narrowness of Mill Road leads to parking on footways. If this did not occur, larger vehicles are likely to be blocked by parked vehicles. The presence of vehicles on the footways would force pedestrians and vulnerable highway users, including school children to use sections of the carriageway. This is unacceptable for highway safety reasons.

9.7 Footpath 14 that provides a route to the south is currently unlit, has a poor surface in places, is partially obstructed by a gate and crosses a narrow wooden bridge over a stream. Although the applicant proposes to offer a contribution to improve this route, it has not been demonstrated that the route could be upgraded to a standard that would safely accommodate pedestrians and vulnerable highway users, including school children, at all times.

9.8 The site has very poor access to bus services. The majority of the site is in excess of 600m from the nearest bus stop. The route to the nearest bus stop is along Mill Road that, as described above, has poor provision for pedestrians. Paragraph 5.54 of the Essex Design Guide is very specific on this issue. It states that, '...***so as to comply with ECC policy*** **[...]** ***all new homes*** **[should be]** ***located within 400m actual walking distance of a bus stop***'.

9.9 Scrutiny of the applicant's review of Active Travel England's Checklist reveals numerous instances where criteria are not met (local amenities not within 800m, walking routes of poor standard, bus stops over 400m from the site) and several instances where the applicant has clearly wrongly stated that criteria are met when they are not.

9.10 A review of the proposed site access where it connects with Mill Road identifies several highway safety concerns including a lack of visibility for drivers emerging from the remaining section of Mill Road forming a priority junction with Mill Road/site access and the loss of a passing opportunity at the existing bend on Mill Road.

9.11 The proposed junction of the site access road with the northern section of Mill Road has not been shown to be able to safely accommodate the swept paths of larger vehicles and it appears that the loss of the passing place on Mill Road may lead to highway safety concerns as drivers may use the bell-mouth of the junction as a passing bay.

9.12 The proposed amendments to the Southminster Road/Mill Road/Green Lane junction are contrived in that they ***narrow*** Southminster Road at the existing bends, 'smooth out' the bends (thus encouraging higher speeds) and require road narrowings to slow vehicles to overcome poor visibility. The proposed treatment of the junction and this section of Southminster Road is inconsistent with the local road environment.

9.13 It appears that the section of Southminster Road that is proposed to be narrowed leads to large vehicles either conflicting with oncoming vehicles or over-running the edge of the carriageway. It also appears that northbound drivers may have insufficient forward visibility to be able to negotiate the proposed road narrowings without meeting oncoming vehicles who expect to have priority thus leading to potential head-on collisions.

9.14 The proposed development is shown to lead to a 27 second increase in delays for drivers on the B1010 arm of the B1021 junction in the PM peak hour. This is not a negligible increase.

9.15 The proposed development will lead to an increase in traffic flows on the highly constrained and highly sensitive Green Lane. This effect would be exacerbated by the increased delays at the B1021/B1010 junction.

9.16 The significant adverse highway safety and amenity impacts of construction traffic constitute a justifiable reason to refuse this application.

9.17 Overall it is concluded that the proposed development is not acceptable from a transport and highways perspective because of the adverse highway safety impacts of pedestrians being forced to use the carriageway of Mill Road, the lack of safe visibility at the Mill Road/site access junction and the deficiencies of the proposed reconfiguration of the Southminster Road/Mill Road/Green Lane junction. The site also suffers from very poor pedestrian, cycle and bus access as a result of the distance to facilities and very poor provision for pedestrians along Mill Road.

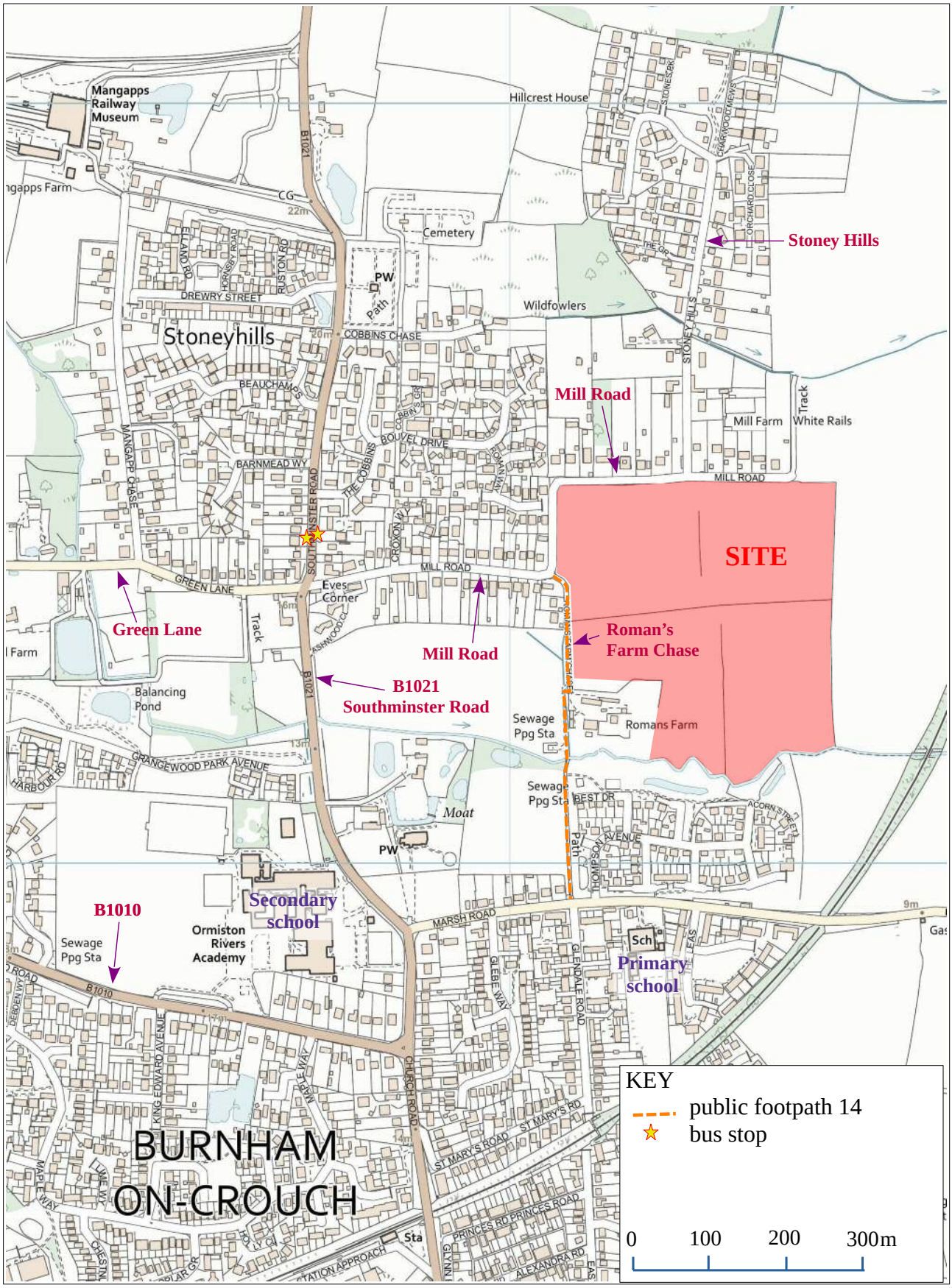
9.18 In Policy terms, the proposed development meets the threshold for refusal set out in Paragraph 116 of the National Planning Policy Framework because there would be an unacceptable impact on highway safety:

> *'116. Development should only be prevented or refused on highways grounds if there would be an* ***unacceptable impact on highway safety****, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios'.* [emphasis added]

Figures

Figure 1: Site and Surrounding Transport Networks

Figure 1: Site and Local Transport Networks



Appendices

Appendix 1: Proposed Southminster Road/Mill Road/Green Lane Junction (i-Transport Drawing No. ITB19373-GA-009 rev.C)

KEY:

ASSUMED HIGHWAY BOUNDARY

SCALE BAR @ 1:500

Give way to oncoming vehicle

1.5m x 53m PEDESTRIAN VISIBILITY SPLAY (TO CENTRELINE)

CYCLE BY-PASS TO ACCOMMODATE ON CARRIAGEWAY CYCLISTS

PROPOSED PRIORITY WORKING WITH CYCLE BY-PASS

Priority over oncoming vehicles

2.4m x 48m VISIBILITY SPLAY (UNCHANGED FROM EXISTING SITUATION)

2.4m x 53m VISIBILITY SPLAY

DROPPED KERB CROSSING WITH TACTILE PAVING

TIE INTO EXISTING CARRIAGEWAY

2.4m x TANGENTIAL VISIBILITY SPLAY

PROPOSED EXTENDED FOOTWAY / AREA OF HARDSTANDING

MINOR RE-ALIGNMENT OF CARRIAGEWAY

EXISTING ACCESS RETAINED VIA EXTENDED VEHICLE CROSSOVER STYLE ARRANGEMENT

PROVISION OF DROPPED KERB CROSSING AND TACTILE PAVING

6.0m

PROVISION OF NEW KERBLINE WITH MAXIMUM 25mm UPSTAND TO REPLICATE EXISTING ARRANGEMENT - PRECISE ARRANGEMENT TO BE AGREED AT DETAILED DESIGN STAGE

1.2m x 48m PEDESTRIAN VISIBILITY SPLAY (TO 0.5m OFFSET)

TIE INTO EXISTING FOOTWAY

MINOR LOCALISED CARRIAGEWAY WIDENING

2.4m x TANGENTIAL VISIBILITY SPLAY

Priority over oncoming vehicles

TIE INTO EXISTING CARRIAGEWAY

2.4m x 55m VISIBILITY (TO CENTRELINE)

PROPOSED PRIORITY WORKING WITH CYCLE BY-PASS

CYCLE BY-PASS TO ACCOMMODATE ON CARRIAGEWAY CYCLISTS

2.4m x 59m VISIBILITY (TO ONCOMING TRAFFIC)

Give way to oncoming vehicle

Stonegate
Hunton Lodge
Caedmon
Westglen
Homestead
Lonicera
Glenwood
Sub Sta
Limes
SHWOOD CLOSE
Southminster Road
Mill Road
Green Lane

REV	DATE	BY	DESCRIPTION	CHK	APD
C	04.07.25	SH	ESCC COMMENTS INCORPORATED	BT	BT
B	23.04.25	SH	RSA COMMENTS INCORPORATED	BT	BT
A	29.01.25	SH	UNCONTROLLED PEDESTRIAN CROSSING ADDED	BT	BT

CLIENT: WELBECK STRATEGIC LAND

STATUS: FOR INFORMATION

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The Square, Basing View, Basingstoke, Hampshire, RG21 4EB

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www.i-transport.co.uk

TITLE: B1021 / SOUTHMINSTER / MILL ROAD / GREEN LANE - PROPOSED JUNCTION IMPROVEMENT

PROJECT: LAND EAST OF MILL ROAD, BURNHAM-ON-CROUCH

DRAWN:	CHECKED:	APPROVED:
SH	BT	BT
PROJECT No:	SCALE @ A3:	DATE:
ITB19373	1:500	19.07.24
DRAWING No:		REV:
ITB19373-GA-009		C

T:\Projects\19000 Series\19373TB - Land East of Mill Road Burnham-on-Crouch\Tech\Acad\i-Transport Drawings\Working Drawings\GA\ITB19373-GA-009C.dwg