

**Hockley Residents Association  
Objections to RDC's Core Strategy Submission DPD October 2009  
Highways' Strategy**

**Ref: HRA1  
13 April 2010**

- 1 My name is Brian Guyett. I have been a resident of Hockley for nearly 30 years and am chairman of Hockley Residents Association, which was founded in 1955.

This is a joint representation on behalf of the following Groups:

- Hockley Residents Association (Representations 15833/9, 15915)
- Hockley Parish Plan Group (16126)
- Hockley-Under-Threat (16755/8; 16744/51)
- Hawkwell Residents Association (16740)

- 2 For the avoidance of doubt these comments relate to the RDC Core Strategy as a whole, focus on highways issues, and address the three infrastructure questions raised in the Inspector's "Matters & Issues" paper dated 23 March 2010:

- *Firstly, does the CS identify critical infrastructure to support the development proposed, and does it articulate what, when and by whom it will be provided?* We will show that it does not and that the District's highways' infrastructure is inadequate to support the extra traffic arising from the extra housing to be scattered across the District and from moving industrial estates to the outer edges of the District. There are no economies of scale to facilitate essential improvements and no plans to address the overall impact.
- *Secondly, are critical decisions which should be made in the Core Strategy being delegated to the Transport SPD.* We will show that no statistical analysis has been undertaken and no decisions made on the key issues. The Transport SPD is currently limited to parking standards and it is evident that the critical decisions have not been addressed.
- *Thirdly, is there adequate evidence to demonstrate that the requirements of the proposed standard charges are reasonable and will deliver the infrastructure necessary to support development?* We will show that the policy of scattering houses across the district in 13 smallish sites means that the use of Standard Charges is wholly inappropriate and that the overall impact of all these developments on our highways have not been assessed or costed and the proposals are therefore unsound.

- 3 Critical Infrastructure

- 3.1 In looking at the critical highways infrastructure requirements, we need to bear in mind that the population of Rochford District is predominately spread on a West/East axis along the railway line. Movement, particularly,

north/south, is severely constrained by the need to cross the railway line and the resultant bottlenecks created by the railway bridges. Several of these are low and have height restrictions and the railway bridge on Rectory Road, Hawkwell is severely limited by its one-way, traffic lighted controlled, operation.

The main roads are, almost without exception, former country lanes that have developed over the years. Such development means that they tend to be narrow, twisting and run through the centre of towns and villages with little/no space for further growth.

There are few cycle-ways and often little or no room for more.

- 3.2 RDC are proposing to scatter developments across the district in at least 13 sites but no detailed consideration has been given to the overall implications for highways across the District.

Many roads across the District are at or near capacity but no modelling has been undertaken to determine the impacts or the funding required to upgrade them. At the Central Area Committee on 25 June 2009, RDC stated (in response to a question):

“Rochford Council is not the highway authority, but is working closely with Essex County Council to identify highway infrastructure requirements. Highway infrastructure improvements will be set out in the Core Strategy and other subsequent Development Plan Documents as required. *These will be fed into the next version of the Essex Local Transport Plan, which is effectively a bidding document for funds to implement highway infrastructure improvements, schemes to tackle congestion, etc.*

The District Council is working closely with the Essex County Council to ensure that highway infrastructure identified in the Core Strategy *can* be delivered.”

It is self-evident from RDC’s own words that the critical requirements have not been identified, costed and provided for.

- 3.3 The CS also proposes moving major industrial estates in Rayleigh and Hockley to new, out of town locations, at either end of the district, with poor public transport links. This is contrary to government policy PPG4, which states;

- (EC7.3C) “out-of-centre sites, with preference given to sites which are or will be well served by a choice of means of transport and which are close to the centre and have a high likelihood of forming links with the centre.”
- (EC7.5 1) “whether the site is or will be accessible and well served by a choice of means of transport, especially public transport, walking and cycling, as well as by car”.

There is no/little existing public transport to the new sites and no obvious likelihood of forming links with any existing centres. Cycle-ways are few and there is little room for building new ones.

In particular, the Core Strategy proposes to replace two Hockley Industrial estates with a greenfield site near the airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area from Hockley. There will also be extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP), which proposes considerable growth at neighbouring Southend Airport, as well as the new industrial estate. The site's remote location, accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

As a consequence, RDC recognises the extra traffic volumes in this area and are proposing to upgrade the adjoining road (Cherry Orchard Way) to a dual-carriageway, but this road is only about one mile long. There are no plans beyond that!

The main connecting road (the B1013), which runs through Hawkwell and Hockley, will remain single-carriageway. It is already at 72% of capacity (ECC Highways stats). There are no studies, or decisions, on what changes (if any) are needed and how they will be paid for.

The plans for these new industrial centres also contravene PPS1 (27 vii) "Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges".

Thus, the Core Strategy contravenes its own policy T1 and is unsound. It is also clear that (i) the combined impact of scattering houses across the District and relocating Industrial Estates to the very edge of the District with no public transport services will exacerbate existing problems. The extent of improvements required is both unknown and not funded and the proposals are unsound.

- 3.4 The Local Transport Plan sets out Essex County Council's long term plans and policies for the future of transport in Essex. for the period 2006-2011. But, as far as I can see, there has not been any evaluation of the CS upon the Local Transport Plan, which in itself may need to be changed to respond to the CS and render it deliverable and sustainable under PPS12

(See:[http://www.essexcc.gov.uk/vip8/ecc/ECCWebsite/content/binaries/documents/Essex\\_local\\_transport\\_plan\\_The\\_Essex\\_approach\\_to\\_.pdf](http://www.essexcc.gov.uk/vip8/ecc/ECCWebsite/content/binaries/documents/Essex_local_transport_plan_The_Essex_approach_to_.pdf))

The LTP is, I believe, not up for formal revision until 2011 which means that

the Rochford Core Strategy will be in place before this is formally revised. Therefore, the implications are not known, not costed and unsound.

- 3.5 The Department for Transport says that it wants local transport planning to be seen as a vital and essential public service - a service that can be relied upon not just to solve problems, but to deliver opportunity for all, and to enhance quality of life.

In a similar vein, the emerging Core Strategy says that it aims to

- 'locate development in areas where alternatives to car use are more viable' (Page 33 Paragraph 2.62)
- 'reduce the requirement to travel' (page 16) and
- "It is important that new development be accompanied by the requisite highway infrastructure improvements to mitigate their impact on the existing network' (page 104 paragraph 10.9).

However, it is not possible to meet these criteria, in much of the District, due to the existing poor bus services and the lack of suitable space to enhance local roads, exacerbated by plans to relocate employment to the outer edges of the District.

Bus services across the District are poor. There is just one an hour between Rayleigh & Hockley and Rayleigh and Hawkwell, and no north/south routes, resulting in a reliance on private cars for transport.

The existing bus services through Hockley and Hawkwell are already subsidised by ECC. The bus operator has publicly stated they cannot compete with the railway, thus making improvements to new sites away from major centres unlikely.

SERT (South Essex Rapid Transport) is put forward in the CS as a solution to reducing car use but it will only skirt the edge of the district and the Core Strategy acknowledges there is only "*potential*" to enter the District in the future.

SERT is not realistic or reliable a solution and the CS proposal is therefore unsound. This means that no realistic, sustainable public transport solutions have been identified.

Accordingly, residents believe that the infrastructure to sustain the CS under PPS12 has been grossly underestimated and the CS is therefore unsound.

- 3.6 There are no cycle paths or space for such provision on roads such as Rectory Road, Hawkwell or the B1013. To use a cycle on these roads is too dangerous especially for the young and for the age-ing. There is no money , or plans, to build new cycle ways.

The CS therefore also contravenes the its own stated aims of reducing carbon

emissions; reliance on car transport and providing “an integrated network of cycle paths”.

#### 4 Critical decisions

- 4.1 Turning to the issue of “Critical Decisions”, the first requirement is adequate data on which to make decisions. Such information is totally lacking.

The District’s highways are already very busy and extra traffic volumes can be expected if proposals to expand Southend Airport proceed. The overall impact of such extra traffic, or from the CS, has not been assessed.

We have tried to get data from ECC Highways on existing traffic volumes but only that for the B1013 in Hockley has been provided. The B1013 is reported by ECC Highways to be running at 72% of its theoretical capacity. ECC Highways told us that they will not undertake traffic counts elsewhere! (Andy Hilson, Highways District Manager, 5 Nov 2009).

We have also been told that Essex Police have data showing that Rectory Road, Hawkwell is even busier but there are Data Protection restrictions on the information. According to Councillor John Mason the data does show that in the same period of time and coincident dates there are 34% more traffic movements on Rectory Road than on the B1013.

- 4.2 ECC also raised the issue of highways’ capacity and RDC has responded .

#### **“RDC Consultation Statement at Submission of Core Strategy for Rochford District**

Appendix 3 – Summary of issues raised Pre-Submission consultation and initial officer comments

Page 169 - Issue raised by Essex County Council as Highways Authority  
[http://www.rochford.gov.uk/PDF/planning\\_cs\\_consultation\\_statement.pdf](http://www.rochford.gov.uk/PDF/planning_cs_consultation_statement.pdf)

The Highways Authority is concerned that any proposed redevelopment of Green Belt sites could result in development in areas with limited access to sustainable transport modes therefore resulting in higher levels of car usage and subsequent impact on the SRN (strategic road network). Although the Highways Authority recognises that new public transport hubs that would facilitate the use of non-car modes could be developed over time, this process is likely to require very substantial investment.

It is therefore important that an appropriate assessment of infrastructure requirements is performed for development sites on Green Belt land. Funding towards the necessary public transport infrastructure improvements must be sought and secured prior to

occupation of any new development on Green Belt land.

Furthermore, the occupation of such developments should be phased in line with necessary transport infrastructure”

### **RDC Response**

“The evidence base confirms that not all of the District’s housing requirement can be accommodated on land outside of the Green Belt.

The Sustainability Appraisal recognises that “The actual locations for growth proposed in the policy are considered to be the most sustainable options available, within the context of the overall high levels of population growth being proposed in the East of England Plan” (paragraph 5.17).

The importance of ensuring infrastructure is provided alongside development is recognised in the Core Strategy, and extensions to the residential envelope will be phased as set out in policy H2 and H3. Appendix H1 identifies infrastructure requirements for each general location. The issue of highways is addressed within policy T1 and T2, and public transport is addressed in policy T3. Appendix CLT1 identifies funding for both highways and public infrastructure improvements”.

We feel that the basis and content of the RDC argument against the concern does not fulfil a SOUND position in response to ECC concern.

## 5 Standard charges

5.1 The CS states that each Location will provide its own infrastructure under agreements with developers. Information on what is thought may be necessary *for each site* is included in the CS.

But the overall, cumulative and non-site specific effects of all the strategy as a whole is not considered

We have been unable to get utilisation statistics from ECC Highways for any the key roads (confirming the lack of strategic capacity planning) apart for the 72% figure for the B1013. However, ECC Highways have confirmed that the cumulative effect of extra housing has not been re-evaluated.

It is therefore not known:

- what improvements will be required and
- whether they can be physically achieved.

Therefore any additional infrastructural changes that are necessary from a cumulative and overall strategic view of the CS have not been assessed and no view can be formed at the present time as to whether such unidentified

needs are deliverable, affordable or sustainable.

Thus the proposals are not founded on a robust and credible evidence base and are unsound.

- 5.2 PPS12 4.9 states “The infrastructure planning process should identify, as far as possible: infrastructure needs and costs”. Neither needs nor, especially, costs have been identified.

The district’s highways suffer from years of under investment and over use. The Core Strategy proposes to fund infrastructure improvements through use of Standard Charges. However, no detail is provided and no attempt made to identify the likely scale of such charges. It is therefore unclear if use of Standard Charges is financially viable.

Policy T2 provides a list of required highway improvements. The list contains most of the more major roads in the District including Rectory Road, which has a single track, traffic light controlled railway bridge. 600 dwellings are proposed for the northern end of Rectory Road and a further 175 at the southern end and 600 more nearby. The cost of addressing the railway bridge bottleneck will be significant but is not even mentioned!

No attempt is made to either cost these charges or explain how improvements not linked to any one specific development will be paid for (eg B1013; Ashingdon Road; a network of walking, cycling, bridleways).

The concept of paying for improvements through use of Standard Charges is inappropriate, unproven and unsound.

## 6 Conclusions:

1. the critical infrastructure requirements have not been identified:
  - the District’s roads, especially the B1013, Rectory Road and the railway bridge bottlenecks are already under pressure with little scope for improvement
  - public transport is very limited and already subsidised by ECC
  - extra housing and out of town industrial estates will create additional, unsustainable traffic movements
2. the overall impact on Highways is unknown, uncosted, probably unaffordable and scattering development around the district means there are no economies of scale. Critical decisions in this regard have simply not been made.
3. there is no evidence whatsoever that use of site specific Standard Charges will not address these widespread, generic problems.

Thus, the CS proposals are unsustainable and unsound.