

# ROCHFORD CORE STRATEGY EXAMINATION

## Objection to RDC's Local Development Framework Core Strategy Submission Document

### Introduction

My name is Tim Gleadall. I have lived most of my life in South East Essex and been a resident of Hockley for nearly 24 years. I am Vice Chairman of Hockley Parish Plan Group.

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

Group	Related Representations
Hockley Parish Plan Group	16120, 16121, 16126
Hockley Residents Association	15840, 15841, 15842, 15845, 15846, 15847, 15850, 16144, 16145
Hawkwell Residents Association	16740
Hockley-Under-Threat	16741, 16742, 16752, 16759, 16760, 16761, 16762, 16763

### Location and Supply of New Homes

The Core Strategy submission document includes a housing allocation (Paragraph 4.6) of 1,177 new dwellings between 2006 and 2021 under the category of 'Existing locations / other appropriate sites identified in Strategic Housing Land Availability Assessment'.

The Strategic Housing Land Availability Assessment (Paragraph 4.14 and Policies H1, ED3, ED4) examines four sites that are currently allocated for employment: Eldon Way / Foundry Estate, Hockley; Rawreth Lane Industrial Estate, Rayleigh; Stambridge Mills; and Star Lane Industrial Estate, Great Wakering. In the case of all four sites, the Council believes that their redevelopment for alternatives to employment (i.e. housing) represents a more appropriate use of land with a proposed total of 795 dwellings as shown in Appendix H2.

Location	Number of Dwellings	Construction Period
Stambridge Mills	250	2010-2012
Star Lane Industrial Estate	175	2014-2017
Rawreth Industrial Estate	220	2017-2020
EldonWay/Foundry Industrial Estates	150	2019-2021

The Council recognises that additional land in more appropriate locations must be allocated for employment in order to accommodate business displaced from these sites, and proposes greenfield sites West of Rayleigh, North of London Southend Airport and South of Great Wakering – all at the extremes of the District.

The proposal is unsound and cannot be justified for the following reasons:

**1. No RDC consultation on Strategic Housing Land Availability Assessment (SHLAA) – Proposed Sites for Industrial Estate Reallocation – Reference: Paragraph 4.14, Appendix H2, and Policies H1, ED3, ED4**

During the pre-submission Core Strategy consultation period, the SHLAA had not been published and there were no opportunities to comment on it. Hence the Core Strategy was not supported by a robust and transparent evidence base and is unsound.

The 2007 Rochford Urban Capacity Study (UCS) states that redevelopment for housing of the four sites currently allocated for employment is unlikely within the plan period and potentially unsustainable. The UCS states that the redevelopment of land currently used for employment would reduce demand for residential development on Greenfield sites, but at the same time create a need for alternative sites to be found for employment. Such an approach, which would be likely to require the decontamination of existing employment land to make it fit for residential use, together with development of a greenfield site and implementation of additional infrastructure to serve the new employment area, may well be unsustainable.

The Core Strategy should not be based on the assumption that housing would be available when redevelopment of the four sites is unlikely within the plan period, or where redevelopment is unsustainable.

**2. No RDC consultation on the very specific proposals to relocate the Eldon Way and Foundry Industrial Estates – Reference: Policies H1, RTC 6**

The previous version of the Core Strategy stated “we will look at opportunities for more valuable and appropriate uses of the industrial land” with absolutely no consultation at all on the concept of moving existing Eldon Way businesses entirely.

The Foundry Industrial Estate has never even been previously mentioned in any plan version. A recent amendment to the Core Strategy states this omission was due to a typing error.

The Urban Capacity Study, commissioned by RDC to develop Town Centre Development Proposals for Rochford, Hockley and Rayleigh, stated a “low probability” of housing for Hockley and did not even mention the Foundry Estate.

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

### **3. Previous consultations and public opinion ignored by RDC – Reference: Paragraph 11.32, Policies H1, ED3, RTC 6**

Public opinion in Hockley is strongly against both the HAAP and Core Strategy proposals for Hockley Village Centre.

The Hockley Parish Plan (dated 2007) clearly states that residents are strongly against any large scale housing development in Hockley, but if there has to be additional housing, then there should be no loss of greenbelt or open spaces, and no large housing estate developments. It was also stated that any developments must be matched by the appropriate levels of infrastructure. These basic requirements have been ignored in the Core Strategy by transferring industrial units to greenfield sites and proposing a large housing estate at Eldon Way with no material infrastructure improvements.

The proposals also ignore the 95% rejection rate of respondents to RDC's own Hockley Area Plan (HAAP) Consultation (2009), which included specific proposals for Eldon Way (HAAP did not even mention the adjoining Foundry Industrial Estate). Why have a consultation and ignore it?

A resident survey undertaken by local groups HPPG, HRA, and HUT in October 2009 had 972 responses (approximately 20% of households) and the key results were:

- Shopping areas - only 5% in favour of major redevelopment
- Eldon Way & Foundry Industrial Estates - only one in eight was in favour of major change. If redevelopment is enforced, then the most popular choices for change were a youth centre, a healthcare centre and additional leisure facilities, with just 1% supporting residential development.

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

### **4. Core Strategy pre-empts Hockley Area Action Plan – Reference: Policies H1, RTC 6**

Eldon Way and Foundry Industrial Estates form a significant part of the ongoing Hockley Area Action Plan (HAAP) consultation but the Core Strategy proposals pre-empt the next stage of the HAAP consultation.

Neither the Core Strategy nor HAAP define its status relevant to the other plan and subsequent priorities. Why is there no cross-referencing between concurrent plans affecting the exact same piece of land?

There are also inconsistencies between the Core Strategy and HAAP regarding the description of proposed uses for the two industrial estates. The Core Strategy refers to Leisure, Commercial and Residential whilst HAAP mentions a "village green, introducing a significant area of public open space". There is not sufficient space for both and the Core Strategy is again pre-empting the ongoing HAAP.

If a decision is taken now, as part of the Core Strategy, to relocate all the existing businesses on the two estates, it will set a legal precedent which HAAP will need to follow and renders the next stage of HAAP virtually redundant.

Particularly given the 95% rejection rate of respondents to the previous round of HAAP such an approach is entirely undemocratic and unsound.

## **5. The Core Strategy misrepresents the findings of The Retail & Leisure Study (R&LS) 2008 - Reference: Policies H1, RTC6**

The Core Strategy states (Paragraph 12.38) “The Retail & Leisure Study indicates Hockley has **great potential**. Hockley has been identified as having a **need for additional convenience floorspace**”.

Whereas, the R&LS actually states:

- 1) (Paragraph 10.26) “the scale of need does not lend itself to a foodstore capable of retaining a significant proportion of main food shopping expenditure”.
- 2) (Paragraph 10.28) “There is **no immediate capacity for additional floor space.**”
- 3) (Paragraph 10.29) “we recommend that focus be maintained on **developing Hockley’s existing strengths, rather than retail expansion**”
- 4) (Paragraph 10.31) “The current nature of **Hockley does not lend itself to classification as a ‘town centre’** as defined by PPS6. Moreover, we have identified that it is a very small catchment population. Accordingly, the Council may wish to consider reclassifying Hockley from a town centre to a district centre”.

Under the Hockley Area Action Plan proposals, redevelopment of the town centre and Eldon Way / Foundry Industrial Estates is treated as a single, integrated proposal. To do either part in isolation would be inappropriate but RDC have misrepresented their Evidence Base, thus undermining their entire proposals for the area as a whole.

The Core Strategy is inaccurate, misleading and unsound.

## **6. Transportation – Reference: Section 10, and Policies H1, T1, ED2**

Proposals for moving employment to out of town locations, at the extremes of the district (West of Rayleigh, North of London Southend Airport, and South of Great Wakering), with no existing public transport links, are contrary to government policy PPG4. It also contravenes the Core Strategy's stated aims of reducing carbon emissions by reducing the reliance on private car transport and providing "an integrated network of cycle paths".

The District of Rochford is predominately spread on a West/East axis along the railway line. Hockley is located in the middle of the district and Eldon Way and Foundry Industrial Estates are adjacent to the railway station. Bus services are poor and the operator has admitted they cannot compete with the railway making improvements to new sites away from major centres unlikely. Existing bus services to Hockley and Hawkwell are subsidised by ECC.

However, the Core Strategy proposes to relocate these two estates primarily to a greenfield site near London Southend Airport. This site is 2-3 miles from the nearest railway station and there are currently no bus services to the area. As a result, RDC are proposing to upgrade the nearest road to a dual-carriageway, although the main connecting road (the B1013), which runs through Hockley, will remain single-carriageway and is already at 72% of capacity (ECC Highways statistics). This is despite extra traffic expected in the area as a result of the Joint Area Action Plan (JAAP) which proposes considerable growth at neighbouring London Southend Airport, as well as the new industrial estate.

Likewise the Rayleigh and Great Wakering sites are poorly positioned and poorly served by public transport.

The sites selected for the new industrial estate also contravene PPS4 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". There is no existing public transport and no obvious likelihood of forming links with any existing centres.
- 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". Its remote location, accessed by the narrow, busy B1013 is not suitable for access by cycle or on foot.

It also contravenes 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".

The Core Strategy also contravenes its own policy T1 and is unsound.

## **7. Highways Infrastructure and Traffic – Reference: Appendix H1, and Policies T1, T2**

The Transport Evidence Base has not been re-evaluated following the decision to impose extra housing on the four current Industrial Estates. ECC Highways have confirmed that the district's major artery, the B1013 is running at 72% of its maximum theoretical capacity and the effect of extra housing in Rayleigh, Hockley, Hawkwell, Rochford, and Ashingdon has not been re-evaluated, and it is unclear what improvements will be required or whether they can be physically achieved.

The Highways theoretical capacity does not highlight peak periods, particularly in the evening rush hour, when traffic can stretch back from the Spa roundabout as far as Rayleigh. This is due to the use of the B1013 as a through route as an alternative to the A127. There is no detailed solution in the Core Strategy to the B1013 and the Spa junction congestion issue.

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

PPS12 Paragraph 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 and the Core Strategy is therefore unsound. The overall impact has not been considered.

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 and unclear how it will work for non-location specific improvements.

Policy T2 provides a list of required highway improvements. The list includes enhancements to the B1013 and the Spa junction roundabout but no attempt is made to cost these charges or explain how improvements will be paid for.

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

## **8. Housing Allocation Disruption – Reference: Paragraph 4.14, Appendix H2, and Policies H1, ED3, ED4**

With reference to The Strategic Housing Land Availability Assessment, the Council proposes an allocation of land in greenfield locations West of Rayleigh, North of London Southend Airport and South of Great Wakering for employment in order to accommodate displaced businesses.

In all four current Industrial Estate locations, the new dwellings will add to urban sprawl leading to major disruption during construction due to deliveries of materials and infrastructure development in terms of roads, drainage, sewerage, and utilities / services.

In the case of Rawreth, Stambridge Mills and Star Lane Industrial Estates, the current locations are on the outskirts and remote from the town centres.

However, in the case of Eldon Way / Foundry Industrial Estates in Hockley, the Estates are currently located in the town centre. Although relocation of the industrial units away from the town centre is strategically similar to the other three sites, the construction of a new housing estate in the town centre is not similar and would be chaotic, particularly in relation to additional traffic on the already congested roads in and around Hockley, both during construction (large vehicles carrying building materials moving through the village shopping area), and after completion. Indications from the Core Strategy Planning Team are that there will be 150 dwellings, and in the Hockley Area Action Plan submission, indications are in the region of 150-200 new dwellings.

The proposal is inconsistent and unsound.

## **9. Jobs – Reference: Paragraph 4.14, and Policies H1, ED2, ED3, ED4**

With reference to The Strategic Housing Land Availability Assessment, jobs will be relocated to more remote regions. The new locations will be remote from rail stations and bus routes. Employees without their own transport will have difficulty reaching their place of employment, leading to a possible loss of their jobs. Without major incentives, some businesses and landlords will not want to invest in new locations, preferring to sell out, again leading to the loss of jobs.

In the case of Rawreth and Star Lane Industrial Estates, jobs would at least be transferred to locations within their own Parishes / Regions. However, for Eldon Way / Foundry Industrial Estates, specialist jobs would be lost in Hockley and transferred to other Parishes. Retail outlets and leisure facilities in Hockley Town Centre would lose customers from the Industrial Estates, and could again lead to a loss of jobs.

There are insufficient proposals shown in the Core Strategy to compensate for this loss of employment, especially opportunities for similar specialist jobs. Eldon Way Industrial Estate also contains leisure activities (i.e. a gymnasium, bowling alley, children's play facility, and opening mid 2010 a youth club). These businesses are unlikely to be suitable for relocating to out of town sites, away from population centres, and more jobs may be lost.

The proposal contravenes Policy ED3 and is unsound.

## **Summary**

**The proposal to relocate four Industrial Estates currently allocated for employment to new remote greenfield locations to accommodate new housing estates is unsound for the following reasons.**

- Redevelopment of the four Industrial Estates and redevelopment of replacement Greenfield sites for employment are unlikely within the plan period and unsustainable.**
- There has been no specific RDC consultation related to the relocation of Industrial units from Hockley. The Urban Capacity study stated a low probability of housing.**
- The proposal ignores the Hockley Parish Plan, the overwhelming objections to previous versions of the Core Strategy, RDC's own HAAP consultation, and a residents' survey.**
- The Core Strategy both misrepresents the Retail and Leisure Study regarding additional convenience floorspace requirements, and pre-empts the Hockley Area Action Plan consultation with a different proposed use of Eldon Way.**
- There are limited existing public transport links to the proposed new Industrial Estate locations, leading to a reliance on cars and carbon emission issues. The existing sites are close to local housing and transport links e.g. Eldon Way / Foundry Industrial Estates are within a few minutes walk from Hockley Rail Station and bus stops in Spa Road.**
- Additional traffic moving from East to West across the district and vice versa due to new housing developments and new Industrial Estates on the outskirts of the District will create gridlock on the B1013 in peak periods especially at the Spa junction.**
- There will be disruption during the relocation of the four Industrial Estates. Eldon Way / Foundry Industrial Estates are located in the town centre leading to major disruption to the highways during relocation and housing construction.**
- There will be a loss of jobs with the relocation of the Industrial Estates due to lack of public transport and landlord sell outs, especially for Hockley where specialist jobs will be transferred from the Parish.**