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Ms Lissa Higby
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Dear Ms Higby

Thank you for your letter of 14 June requesting responses on the following.

ABOLITION OF REGIONAL SPATIAL STRATEGIES
EFFECT ON 2009 RDC CORE STRATEGY

I consider current Core Strategy to be unsound and fear if the same, or watered down version is established, developers will achieve approval of unsustainable plans. An objector to the Hall Road planning application alleged RDC Planning department confirmed applications could not be resisted for development at broad locations given in the current Core Strategy. So why consult at all?

HOUSING SITES – DENSITY/DISTRIBUTION

Policies H2 and H3 – Extension of Residential Envelopes (into green belt)

Core Strategy conflicts with Coalition's revised para. 47 of PPS 3 deleting density of 30 units per hectare. When first mooted these policies implied a slight blurring at settlement edges, regrettable enough, but present substantial proposals were not envisaged. As an example, Policy H2 masses proposed housing in the first period to 2015 into a triangle of Ashingdon, Rochford, Hawkwell, threatening coalescence of settlements into an urban sprawl.

It is notable at para. 4.9 'Tier Settlements' that Rochford/Ashingdon, Hockley/Hawkwell are lumped together as if they are urban communities, thus emphasising this error. Ashingdon, Hawkwell, Hockley are separate villages.

Policy H1 Efficient Use of Land for Housing

Exclusion of residential gardens from PPS3 as previously developed land is welcomed. Proposal in Core Strategy at para. 4.15 that 60% of housing on previously developed land is unrealistic and only limited infilling would be acceptable, that Council will resist intensification of smaller sites in residential areas, is reasonable. Nevertheless rule is unlikely to be enforced as demolition of existing good quality iconic housing stock, lending character to the locale still occurs, to be replaced by over-dense development, out of scale with neighbourhood, blighting nearby homes. Hockley does not need the proposal in Hockley Area Action Plan 2009 "development should take place through in-filling existing sites, replacing houses with flats.." thus causing more demolition and increased density of occupancy on the same land. Hockley locals were displeased to learn that.

LACK OF TRANSPARENCY

At Policy H1 Efficient use of Land for Housing Rochford LPA plans redevelopment of Rawreth Lane, Eldon Way/Foundry Hockley, Stambridge Mills, Star Lane Wakering Industrial sites for other uses, including residential, with employment uses directed elsewhere. This results in employment loss and large scale loss of greenbelt to accommodate new industrial sites elsewhere and increased car use due to lack of public transport.

Allocation of housing sites is based on responses to RDC Call for Sites letter sent to some firms and residents in 2007

Policy H2 Extension of Residential Envelopes Relevant table shows 50 dwellings for west Hockley to 2015. This conceals proposal for 150 units proposed for Eldon Way-Foundry Industrial site, giving a total of 200 for Hockley. Numbers for Rayleigh don't include 230 for Rawreth industrial site.

Retail & Town Centres – Policy RTC6 – drastic proposals for Hockley Town Centre and industrial site were made in first stage of Hockley Area Action Plan. Amendments are said to be delivered in subsequent issues of

the Area Action Plan, only first stage of which is complete, but this would be pre-empted by unamended Core Strategy.

Population and Society para. 2.20 Housing need is calculated on a projected population increase of c.5000 by 2021 estimated by Office for National Statistics. Under Housing, para. 2.30 notes current need includes number of people in a household who want to move to form a separate household, based on ONS figure. All this is supposition and unreliable as an evidence base.

INFRASTRUCTURE

Highways and Transport Policies T1 and 2 RDC proposes working with ECC Highways, developers, but admits it has no authority here. It will seek developer contributions, but this is neither detailed, nor costed, so contravenes PPS 12.3 para.4.93: "The infrastructure planning process should identify as far as possible infrastructure needs and costs".

The bulk of housing proposals, very large ones, are eastwards and northwards of Rayleigh. It should be realised the B1013 westwards from Rayleigh through Hockley and Hawkwell, Rectory Road through Hawkwell and Greensward Lane and Spa and Ashingdon Roads through Ashingdon are all narrow winding former country lanes, tarmac'ed over for motorised traffic. Large housing increments are unsustainable off these roads, which cannot be altered without much destruction. These "arteries" are heavily used, particularly at peak hours, not just by local residents, but as through route to Southend and elsewhere to avoid the A127. Latter aspect has been exacerbated by opening of Cherry Orchard bypass for the benefit of Rochford.

In addition six railway bridges in Rayleigh, Hambro Hill, Hockley (Church Road and Spa Road), Hawkwell, Rectory Road and Rochford, Hall Road on Southend to Liverpool Street line are all low and very narrow. It would be impossible to reconstruct them to accommodate arterial roads to serve huge new housing estates. Rectory Road bridge is so narrow as to be controlled by traffic lights. Pavements are inadequate and dangerous.

Para.10.3 says "...highway improvements serving new developments ..in a timely manner..ensuring developments delivered alongside necessary infrastructure". This is insufficient for the large estates planned. It is obligatory that a foolproof plan be devised for revised traffic control and new highways east of Rayleigh, together with details of home and amenity loss by compulsory purchase, is agreed by RDC, ECC Highways, owners affected and developers, inclusive of cost and precise contributions by the latter. Without this, there should be no housing proposals agreed with developers.

It is essential that additional provision is made for medical and dental facilities, school places. It will be necessary to calculate cost of providing extra water supplies, drainage, gas, electricity, waste removal, highway care, telecoms, extra parking.

Some perceive there are many locations in the District that could be utilized for housing without impacting countryside. However, most of the District is flood plain, greenbelt, conservation area or settlements already badly damaged by loss of housing stock to over dense, out of scale intensification.

As noted above, there is a lengthy list of sites compiled from RDC Call for Sites letter 2007. Many of these have already gone to appeal following widespread objections. Others have materialised in face of much resentment and consequent loss of amenity. Others are in greenbelt or could only be achieved by contravening the new definition of previously developed land at Annex B of PPS3 re residential gardens and or overriding deletion of minimum 30 dwelling density from para.47 of PPS3.

Yours sincerely
G Yeadell