

Objection Number 28594 – Linda Kendall

Policies SER1-NEL1-NEL2-BFR4

ROCHFORD DISTRICT COUNCIL

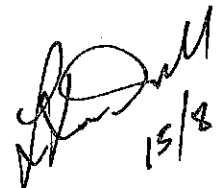
November 2012

Local Development Framework

Allocations Submission Document

Date August 15, 2013

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15/8/13

1. Summary

The objector considers this document to be a full reflection of 5067 individuals of Rayleigh and district that have supported her position that the present allocation submissions document is unfit for purpose. It should be rejected by the Inspector so that a fairer and more equitable solution can be found for development in the district or Rochford



2. Policy SER1- North Of London Road, Rayleigh

Justified.

The proposal is unjustified primarily due to the failure to consult adequately with the residents of the District, as required by primary legislation, see details of current objectors which indicates the level of interest in proposals.

(appendix 1)

The Local Development Framework-Allocations Submissions Document November 2012 by Rochford District Council (RDC) under discussion has fundamental errors and omissions that render it unfit for purpose.

(appendix 2)

(appendix 13)

The Statements of Community Involvement are questionable on many levels

(appendix 3)

Sound

This is the final frontier of the Rochford District before the area is consumed by the, much larger, Borough of Basildon to the west. On the western edge of Rawreth it is the main entrance, to Rayleigh, when approaching by road from Chelmsford, Wickford or London.

(appendix 4)

The proposal will remove much of the Greenbelt sweep of countryside that is the backdrop to the town of Rayleigh. On rising ground it is the first view anyone visiting this historic town encounters. Stretching from the roundabout that connects Rayleigh, and all the towns beyond its boundaries, this vast green lung, on the old coaching route from London to Southend, is the vital ingredient that helps to enshrine the 'character' of the whole district of Rochford. With its 14c Church, historic Windmill and ancient Mound set on high ground to the east, Rayleigh is a lively, popular town. Its residents are proud of its heritage and value the rural nature of the district.

(appendix 5)

The LA should have a landscape "Character Assessment".

(appendix 6)

The objector is confident that the **5067** people that have supported my objection concur with my appraisal of their town. The many letters attached are supporting testimony see appendix 1.

The townspeople are baffled and angry at the appalling decisions being taken in their name by the administration at RDC and Members of Council, they voted into office.

The proposal is an act of sheer vandalism and shows a philistine approach to the task they were set, to find additional housing, for the future needs of the district. It is alleged that much of the land put forward for development, in the call for site process, is owned by the family of a serving Member of the Council. How anybody, with a family history in this location, could contemplate destroying its intrinsic beauty, is beyond the author's imagination. There are suggestions that some land is part of a portfolio of the very august Masonic Order of Freemasons, to whom a number of Members of Council are affiliated. They, and possibly Council Officers, will therefore have been in a position to select, controversial, development sites that will, directly or indirectly, give them a personal benefit. The objector considers this possibly legal but unethical.

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The objector will endeavor to direct the Inspector to the errors and omissions in the documents RDC have produced over seven years, at a cost of £2.1 million pounds to the Taxpayer.

The Core Strategy (October 2011) adopted 13th December 2011 was largely based on erroneous information provided to the Inspector Laura Graham. No responsibility lies with Inspectorate, for this situation, who rely on accurate information being formulated, by Local Authorities, to guide the decision making process.

The Greenbelt entrance to the town does not have to be lost to future generations. There are alternative brownfield sites and less valuable greenfield areas, within Rochford, that can meet the Government targets for housing, without the necessity to ruin this area, of Rawreth and west Rayleigh. Why many sites were rejected by the Planners at Rochford District Council is a mystery. Some of the rejected sites are described as both 'brown field' and uncultivated greenfield, that does not reflect the true nature of the land in question, it is often degraded, previously industrialized land. This site is grade 2/3 agricultural land that should be protected.

(appendix 7)
(appendix 49)

The decision, of RDC, to take possession of land used for 40 years by Rayleigh Sports and Social Club, that provides invaluable opportunities for sport and leisure activities for local families (total membership 700), in order to facilitate the development proposed is risible. This without clear indications of the location and facilities that will replace those lost.

(appendix 8)

The NPPF required LA's to engage with neighbouring authorities. I refer the Inspector to objections 3379 and 3230 whereby a new 'village' could provide for vital housing needs of both Rochford and Southend Borough alleviating much of the pressure on the existing towns and villages that are currently having to provide, unsustainable, excessive housing. That proposal should be revisited.

(appendix 9)
(appendix 10)

Windfall site The Bullwood Hall Prison, in Hockley has been decommissioned and will become available for development from the Prison Estates.

Much of the following mirrors the statement Policy NEL1 with some important additional observations.

The decision, by RDC, to insert a concealment, of names and ownership, clause of the landowners concerned is troubling. It is contrary to the 'Open Government' policy that is claimed to be in place to enable citizens to be confident decisions are taken in 'everyone's' interest, not just the few. RDC has further decided that adjoining landowners can be connected, which is somewhat contradictory. The result is some residents can have information whilst the majority are excluded

(appendix 11)

The objector would draw the Inspectors attention to particular comments and objections from august institutions such as the CPRE and The National Trust referring to greenbelt and 'brownfield' sites*.

(appendix 12)

The LDF Allocations Submissions Document published in November 2012 has serious errors and omissions

(appendix 13)

The East of England Regional Assembly's Plan May 2008 and Review upon which much of the Core strategy, and this document are based, contains serious requirements of LA's

(appendix 14)

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In the same document ECC Highways stated 'No Comment' in relation to the development. Given the concerns of the residents, on the issue of traffic congestion and lack of infrastructure, I find that astonishing and unhelpful to say the least.

(appendix 15)

The serious flooding in and around Rawreth and at the Fairglens Interchange concern residents. Local Plans must take full account of flood risk and should be supported by a strategic flood risk assessment and environmental assessment I can find no up-to-date Assessments.

(appendix 16)

Environmental impact. There is grave concern regarding air quality in Rayleigh

(appendix 17)

There has been much development in west Rayleigh in recent years including Birds / Little Wheatley/ Downhall Park/ Kingley Grange/Victoria Grange/ Park school/ Laburnham Way Estates Over 2000 homes with no upgrade in infrastructure.

(appendix 18)

3. Policy NEL2 West of the A1245, Rayleigh

Justified

This is the proposed re-location site for Heavy Industrial companies currently operating on the Rawreth Industrial Estate (BFR4). RDC have a Compulsory Purchase Order to acquire this site, without reference to the business owners that operate from BFR4. The operations in situ, on BFR4, will be required to re-locate to the new site when their land is subject to a similar CPO.

(appendix 19)

The objector considers the policy NEL2 to be unjustified due to the lack of any meaningful consultation. Objection detail BFR4. The business community have had little or no consultation on this proposal.

(appendix 20)

Soundness

The site chosen is described as 'degraded greenfield'. It is not clear where RDC obtained this classification. The lack of detail regarding the land site NEL2 renders this policy unsound. Does the area require decontamination due to previous usage?

Traffic Impact

Despite the length of time this process has been ongoing, there still remains an incredible number of imponderables attached to these proposals, the most significant and fundamental of which is access to this large site. For RDC to have put forward this proposal, without having previously resolved this issue is a matter of serious concern. It shows a lack of due diligence. Proposals, BFR4, NEL1 GT1 and NEL2 will fail if the Highways issue is found unsound and unworkable.

The proposed use of this location for 'Heavy Industrial' processes and activities, will result in constant ingress and egress of the site. Is there a detailed traffic survey?

(appendix 21)

The proposed relocation of the recycling facility, from central Rayleigh to this remote site will increase traffic movements on London Road/A1245.

GT1 is a proposal to site up to 22 Traveller pitches (44 families with associated vehicles) in this vicinity, apparently using the same entrance. (Otherwise they will have a round trip of several miles to re-enter the proposed GT1 site from the A127 slip-road.) Traveller activity invariably involves many movements of trading vehicles.

The suggestion that this site can accommodate this level of traffic movement is astonishing to the layman, due to the volume of residents, businesses and Traveller Community, expected to access and/or occupy this site. It is on the A1245 within 100 metres of the Fairglen Interchange, one of the busiest junctions in South East, Essex. How this immediate access off the A1245 can accommodate the level of activity proposed, in a safe and effective way, has been questioned by Essex County Council Highways.

(appendix 22)

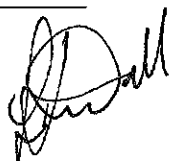
That the landowner is planning to investigate the issues, after such a damning indictment from Essex County Council, is quite incredible. Given the time and the vast sums of public money, £2.1 million, spent on this process, it is unacceptable.

(appendix 23)

A previous planning application was refused due to traffic hazard on this road. (application 10/00582/COU) on appeal APP/B1550/A/11/2151 221/NFW

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(appendix 24)

A handwritten signature in black ink, appearing to read 'Linda Kendall', is located in the bottom right corner of the page.

4. BFR4 Policy Rawreth Industrial Estate

Justification

The Rawreth Industrial Estate is a major contributor to employment opportunities for local residents.

I have difficulty with the BFR4 Policy decision as landowners and business owners have had little or no communication with RDC with regard to the decision to relocate. These companies play a vital role in the district's viability, contributing business rates and employment.

(appendix 25)

It is cavalier in the extreme to announce relocation, leading to potential closure of private businesses, with no consultation with those most affected. Jobs will be at risk due to the possible withdrawal of funding, by lenders, if the estate is perceived to have a limited 'shelf' life. This could damage the viability of an important resource in this district and the wider economy.

(appendix 26)

Soundness/Sustainability

The time frame for the relocation of the major industries presently engaged in business at the Rawreth Industrial Estate is unsound due to deliverability.

(appendix 27)

Possibly due to having no knowledge of these proposals companies, on the estate, have engaged in major expenditure on processing plant. E.g. Flowline. They have more than 100 employees. It is likely therefore the cost of the CPO programme will be prohibitive due to the huge sums of LA finance required to fund the proposal and to obtain agreement from the companies concerned to relocate on site NEL2. Policy BFR4 is not sound due to doubts about deliverability.

(appendix 28)

The objector can find no 'cost analysis' attached to policy BFR4 It appears to be a 'wish list' not a considered option for the estate. Does this make the Local Plan completely irrelevant in relation to this policy?

(appendix 29)

It follows that the need for an industrial development to accommodate offices and B1 and B2 use relocated from this site, is not clearly identified. As indicated there is little evidence of independent office accommodation on BFR4 If it is established that there is a need for such a development the estate, with its road access used by heavy industry vehicles to the Makro enterprise, would be more appropriate for this purpose. The 6.2 hectares site is similar to the size site on South of London Road NEL1. The decontamination issue would also be less demanding than it might be for residential dwellings.

The objector noted the objection 29926 where the transfer of the minimal expected requirement office accommodation to part of SER1 is suggested. This indicates this would be acceptable to development companies that might be employed in any possible eventual redevelopment of BFR4.

This proposal would negate the need for the 'industrialization' of the entrance to the town of Rayleigh by changing the status of the 'Greenbelt' land, **Policy NEL1**. The objector questions why there wasn't a similar proposition, considered by RDC,. RIE is an area of 6.2 hectares (with some discounted due to heritage issues) and NEL1 is an area of 5.1 hectares. It is very much hoped that the redesignation of the land on NEL1 is not a ploy to facilitate another unwelcome out of town' supermarket!

(appendix 30)

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A moderate extension of the Imperial Park industrial site, on Rawreth Lane and of Brook Road would be justified, to accommodate increase in demand for B1 and B2 units displaced site BFR4. Further there is a 'brownfield' site less than 1000 metres distance that could provide any future light industrial requirement. There are other sites, noted in this document, that could serve to protect the Greenbelt entrance to the town.

(appendix 31)

(appendix 32)

The relocation proposal is unsound and unsustainable due to the lack of public transport to the proposed relocation site. Employees, on the Rawreth Industrial Estate, are dependent on public transport to enable them to get to work. There is no public transport provision to the suggested relocation site NEL2, at the junction of major roads it is inaccessible, on foot, as there are no pathways.

(appendix 33)

(appendix 34)

5. Policy NEL1 – South of London Road, Rayleigh

Justification

There has been little or no negotiation with the business community, on BFR4, regarding the proposed re-location to this new Industrial Estate. Therefore RDC does not know who will require re-location They have not consulted with the business community on that site.

(appendix 1)
(appendix 2)
(appendix 3)
(appendix 35)

The lack of any meaningful consultation, with the residents of the district, as to the proposals for this site, mean the policy is unjustified and therefore should be returned for a full re-appraisal

There is no current traffic or transport assessments for this site.

(appendix 1)
(appendix 2)
(appendix 3)
(appendix 36)
(appendix 37)

Please note the lack of consultation with the business community on BFR4

(appendix 38)

Soundness

Policy NEL1 is a proposal to establish an Industrial site on various plots of land South of London Road Rayleigh. The 5.1 hectare site is, predominantly 'Green Belt' Grade 2/3 farmland. This mixed area is rural, in nature, with a backdrop of fields , woods and parkland.

Approaching Rayleigh from Chelmsford, on the A1245, there is a panoramic view, across fields towards the South of the County, almost uninterrupted by development. This 'green aspect' of our town, and general landscape, is what contributes to its appeal. It helps enshrines the original 'character' of the town as a settlement surrounded by fields and woodland.

(appendix 5)
(appendix 4)
(appendix 9)
(appendix 11)
(appendix 17)

(appendix 39)

(appendix 40)

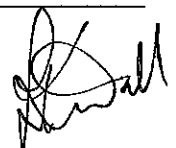
(appendix 41)

The suggested re-locating of a small number of B1 and B2 businesses (from BFR4) to 0.45 hectares on the west of NEL1 is not a proven requirement that would justify this proposal.

(appendix 42)

The objector considers that the LDF document has fundamental errors and omissions that render it unfit for purpose

(appendix 2)
(appendix 13)



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(appendix 43)

The 'local' political representatives have persistently voted against these proposals

(appendix 44)

(appendix 45)

The limited consultation exercise undertaken resulted in 88% rejection. What is the point of any consultation process that leads to a total disregard for the findings?

(appendix 46)

(appendix 47)

(appendix 48)

There is a lack of clear evidence of need for the site. Future needs could be met by allowing mixed development on the, eventually decontaminated, land that may become available at site BFR4.

RDC are in danger of proposing the dismantling of one 'bad neighbour' Industrial Estate and developing another, in a more prominent position, on valuable Greenbelt/farmland.

(appendix 49)

The proposal to fill this green expanse of land, dotted with rural activities, seems to be a form of vandalism on a grand scale. How anyone can justify turning this area into an Industrial Estate is simply beyond imagination. The existing Industrial Estates, Brook Road and Imperial Park provide employment without damaging the character of the town. They could expand to accommodate additional need for B1 and B2 use. It is the objectors view that objection 28926 has some merit.

(appendices 4, 5, 6, 7, 9, 11, 12, 13, 14, 17, all apply)

(appendix 50)

(appendix 51)

The objector would consider that RDC have failed in their duty to identify brownfield sites that would prevent the loss of Greenbelt in our district. A brownfield site, of similar size, just 800 metres along the A1245 could provide for light industrial use.

(appendix 17)

(appendix 52)

This proposal will lead to the final stretch of 'greenbelt boundary being lost between Rayleigh/Rawreth and Basildon, the A1245 being just metres from NEL1

(appendix 9)

(appendix 12)

(appendix 53)

The protection of the Green belt is not met by proposal NEL1.

The failure of RDC to produce a Policy that meets all the criteria required by the NPPF makes this document unjustified and unsound in all respects.

(appendix 1)

(appendix 9, 4, 11, 17)

(appendix 12)

(appendix 16)

(appendix 21)

(appendix 37)



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(appendix 54)
(appendix 55)



6. Appendices

Appendix 1

Localism Act 2011 Duty to hold 'Substantial Consultations when Greenbelt is being developed.
NPPF 2012, Business Section 160
NPPF Section 32 A full Traffic assessment Section 36 LA Act 'RDC should have a travel plan for developments.

List of objectors total 5062 (five thousand and sixty two)
List of those supporting 5

Residents unaware of proposals prior to July 2013 93%
Letters objecting to current plans (numbered 1 – 91)

Contrast the present quantum of objection with that of the Consultation undertaken on SHLAA 2012 2.6 just 34 representations from the whole census. Estimate of population for Rochford of 83,500. *RDC website Information from the 2011 Census

Appendix 2

Due to time constraints the objector has not checked every page of this document for any similar errors e.g.

- Key Diagram (page 13) has omitted the proposed Industrial Area NEL2 and the proposed Traveller site GT1 this Diagram is the first that the public would see when reviewing the whole process.
- The Proposals Map page 163 site GT1 has further been obscured by the broad felt tip marker, outlining the district. Which is unfortunate and careless.

Reference. NPPF section 12 (157) Town and Country Planning Act (Local Development) (England Regulation) 2004.

Appendix 3

Refer objection 3336 Mr P Wild. Consultation document was huge tome and meetings were held before announcement in Rochford Matters, the publication that RDC are relying on to inform the residents. There is evidence from the substantial number of objectors' letters that 93% had no idea of these proposals. Reference figures in letter NO. 47 Mr Alan Buxton In reference to the 2% of the Community that did connect with the RDC, a large percentage of these rejected the proposals (88%). This shows clear disregard for community views, in that the proposals remained unchanged

Localism Act 2011 Duty to hold 'substantial' Consultations when Greenbelt is being developed.

Appendix 4

Reference LDF Allocations Submission Document page 38 paragraph 3.46. Gateway to Rayleigh from the west.

Appendix 5

It is for future generations that we should preserve our environment and the 'Character' of our towns. This should involve all sections of the community.

Appendix 6

NPPF section 11 para 109,111. Section 12 para 126,155.
NPPF 170 Have RDC done this?

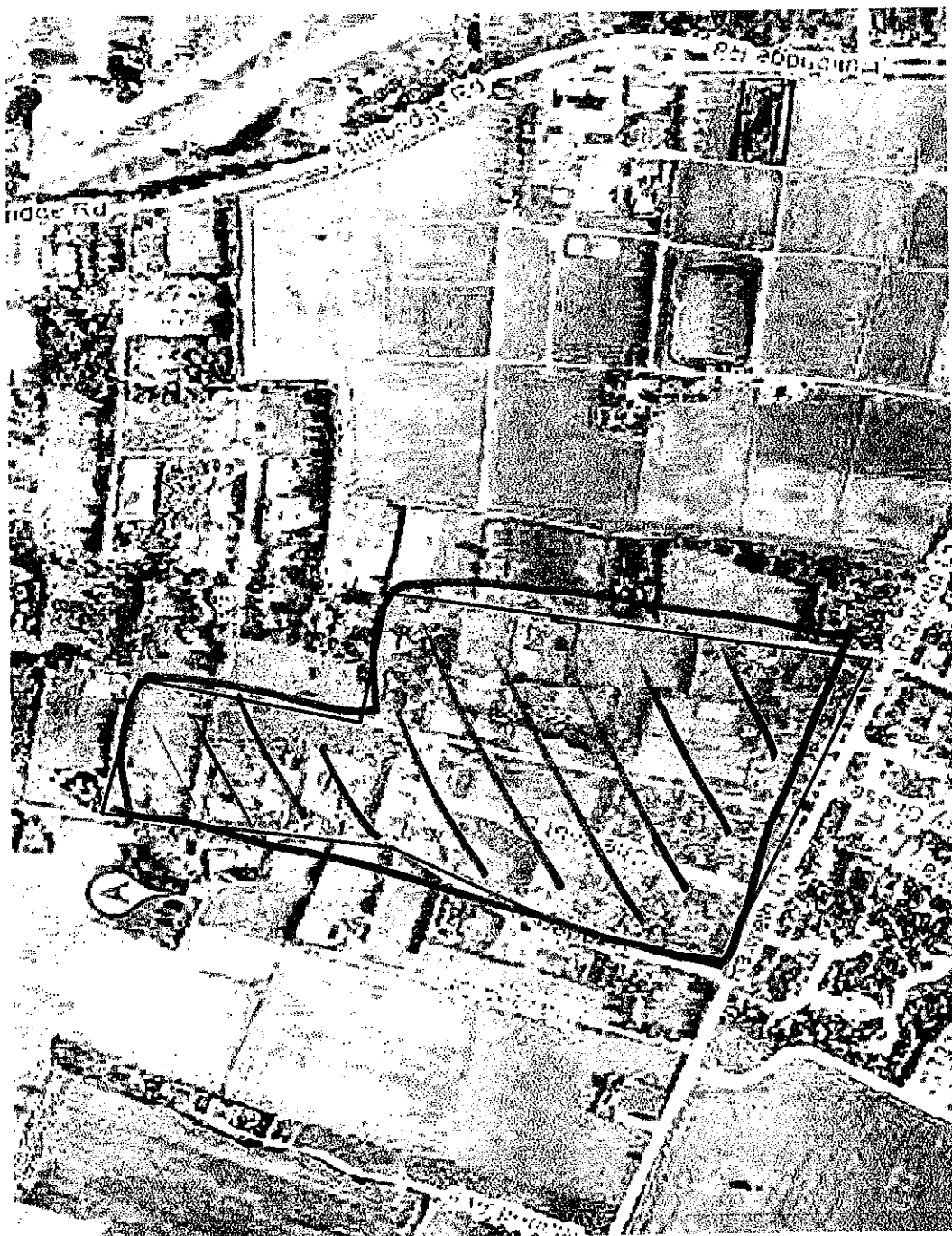
Introduction Local Development Framework Strategy 5.1 district Character must be protected 6.3 policy SS7 E of E Plan.

Appendix 7

The objector has mainly studied sites that are within reach of the disputed greenbelt sites currently under threat of development in the Rayleigh area. With a small number of exceptions e.g Fossetts on



Seabrook
Appendix 7 Land at Trender Ave
Redamation
Yard.



Source: Google Images

[Handwritten signature]

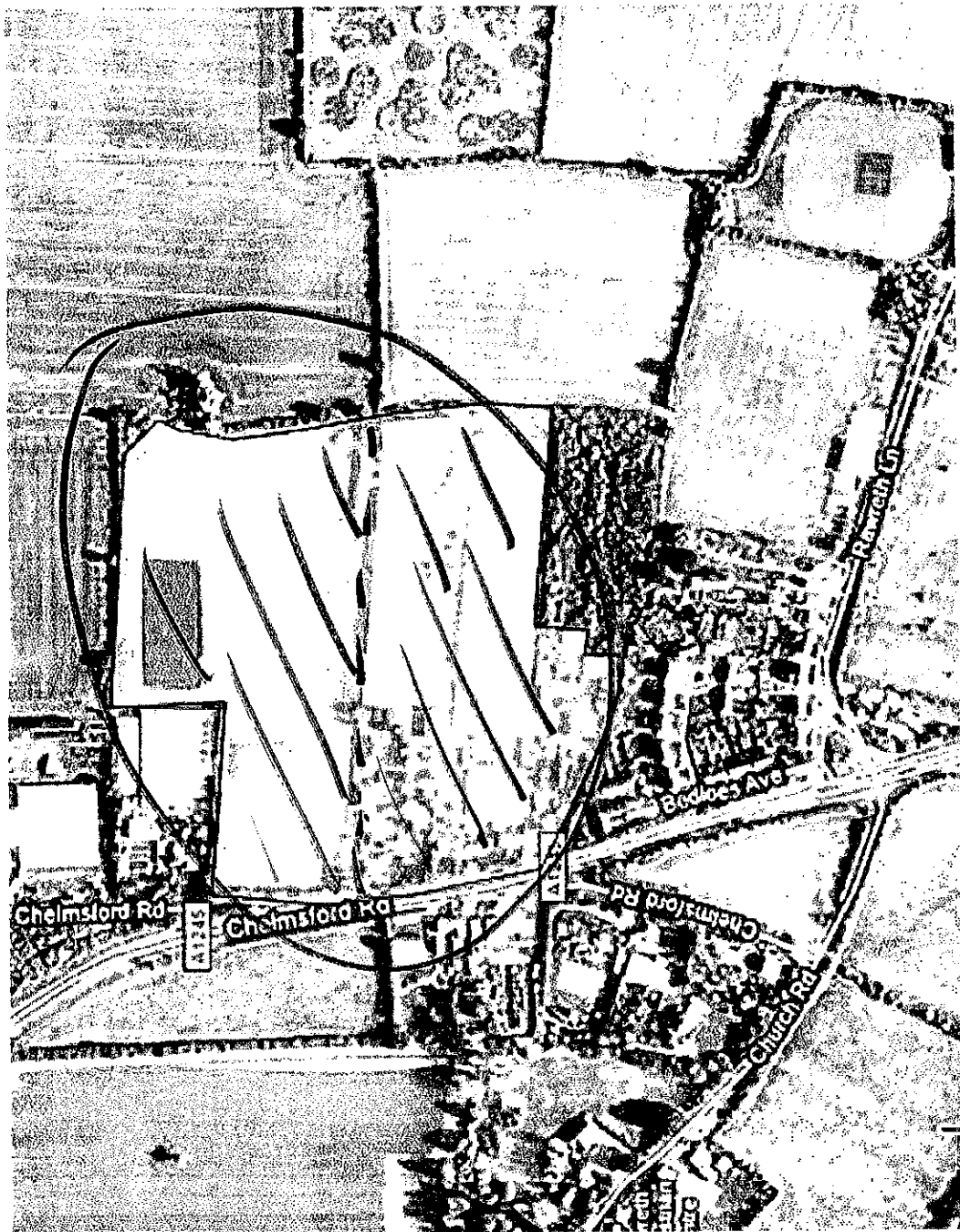
Appendix 7

Call for Sites 186 — See S

Hambro Nursery + Clovelly Works

Battlesbridge - 9.6 Hectars.

low flood
up to 216 Dwellings
or high industrial
on brownfield site



Source: Google Maps

AKDell

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the Rochford /Southend boundary). There is a high probability of similar situations across the whole Rochford district.

Site 22 Poyntens Great Wheatley farm Rayleigh. Capable of 1560 – 2341 homes. Met all criteria, services etc. in area that has had a very low level of development in past 40 years unlike the west of Rayleigh. Adjacent to A127. Rejected due to 'other areas being available'. This site has a mix of unused and greenfield areas.

24. Greensward Lane Hockley. Capable of 108 dwelling. Unremarkable greenfield site positioned between other built areas, in an already developed location, near schools etc.

Site 28. Searles, Trenders Lane Rawreth. 'Brown field' site 21 hectares capable of 420-630 dwelling. Former building reclamation business and yard, now derelict and shrewn with rubbish, (200 metres from SER1. On same access road within easy walking distance of a supermarket, school, bus route and leisure centre) Capable of 420-630 dwelling. No flood issues noted, refused 'would interfere with the openness of the greenbelt'!!!!

Site 29 Western Road Rayleigh (clue is in the name) capable of 100- 150 dwellings All required tick boxes but incorrectly described as 'too close to Southend boundary. Absolute nonsense! The Council did not act with 'due diligence' in relation to this site.

Site 33 193 Southend Road Rochford capable of 85-126 homes adjacent to settled site

Site 34 Wellington Road Rayleigh. 6.48 hectares uncultivated greenfield land with existing track running through it. Capable of 170 homes. Adjacent to settled area with road network. Reason for refusal 'would bring housing nearer to Hockley. Again a lack of due diligence is perceived . Absolute nonsense. This road runs parallel to existing Rayleigh roads, equal in distance from Hockley settlement. Although it is located close to houses of great value that enjoy uninterrupted views across fields! This is not a valid reason to refuse inclusion in the current process.

Site 36 Land off Hambro Hill disused 'Brownfield' site 'needs decontaminating'. I understood the planning process was designed to rid districts of land in need of remedy before Greenbelt was used.

Site 5 Pond Chase Nursery Folly Lane Hockley 4 hectares 'Brown / green field' and industrial buildings on site. Capable of 90 dwellings met all criteria.

Site 179 land at Folly Chase Hockley, 8.8 hectares near school and services capable of up to 264 dwellings. Unremarkable site abutting main railway line, part cultivated. Refused due to 'impact on surrounding fields' Is this a valid reason in planning terminology? (part of this site would be ideal for any planned Community owned Traveller Site, due to rural aspect, and the stated ability for it to be contained by railway the line).

Site 186 Hambro Nursery Chelmsford Road 9.6 hectares capable of 216 houses. Largely 'Brown field'/degraded land covered with disused/derelict greenhouses.

See attached map

Less than 1000 metres from proposed greenbelt site chosen for development. Low flood risk unlike chosen site.

Site 73 ss 186 above but with smaller area. Capable of 110 dwelling. Would offer small village sustainable growth without altering the 'character' of the place.

Site 91. Land in front of Asda store Rawreth Lane denied Inclusion due to lack of suitability, now developed!

Site 112 Disused brickfields on Cherry Orchard Way capable of 158 dwelling. Obvious 'Brownfield' described as greenbelt. Refused. Why are we proposing building on virgin greenbelt and leaving such site to remain? NPPF Section 9



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Site 142 Heath Nurseries Daws Heath Road Rayleigh Disused Nursery with buildings and hard standing. 4.04 hectares Capable of 136 dwelling 'Brown field' described as greenfield. Refused due to need of car journeys. Immediately located for access to A127 negating use of local road network.

Site 146. Eastwood nurseries Eastwood Road Rayleigh This site is capable of 182 dwellings. Mainly unused scrubland and hardstanding. 'Brownfield' stated as greenfield. Further from Southend boundary than current proposed Greenbelt sites are to Basildon Refused due to coalescence with Southend! Again this appears to indicate a lack of 'due diligence' by RDC.

Site 195 Great Wheatley Road 9.2 hectares capable of 311 dwelling easy walking distance of town, schools, shops, main line train station and seconds from the A127 trunk road. This site is already within the built environment so would not damage the 'character' of the town like the present proposals. Refused for highway issues when the location is in easy walking distance of all facilities. Just a few hundred metres from the main line railway station which would therefore not require car journeys similar to the proposed sites. .

Site 129 Limehouse nursery Eastwood. 4.90 hectares of 'brownfield, industrial area' capable of 110 dwelling, near all services, bus routes, schools etc. This site could be redeveloped as replacement for NEL1 suggestion, offices etc. or housing saving our greenbelt.

This list is not exhaustive. It forms part of the information upon which the Core Strategy was determined.

Appendix 8

NPPF Health and Wellbeing para. 171.

Appendix 9

Section 178 duty to cooperate across boundaries.
Section 179 encouraged to develop joint plans.

Appendix 10

See also *appendix 21*

Appendix 11

Elizabeth Fitzroy homes were refused planning permission.
Planning application 11/0492/FUL This Charitable Foundation spent considerable finance on an application that was rejected as late as 5/3/12 due to a) inappropriate development on Greenbelt, b) site was on flood plain c) The land would be part of the Core Strategy and the wider scheme as part of a 'Sustainable Urban Extension'.

Why wasn't that organisation admitted to the 'club', of those privy to the 'secret' information that would have saved this worthwhile charity vast sums of money? Reference SHLAA 2.19 and 2.20. Were they not part of the SHLAA policy of 'neighbouring' landowners being kept informed. Reference. SER1 etc. joint enterprise 'CLUB'.

Appendix 12

SHLAA 2009, RDC Promised to prioritise 'Brownfield site to minimise Green belt land release 2.17
Did RDC reassess 'brownfield sites' due to change in Government policy when old targets were scrapped following the closure of the East of England Regional Assembly. Refer. The National Trust Rayleigh Mount 3768.

The Consultation response from Natural England was that landscape features must be protected from development.

Appendix 13

Page 36 Figure 6 is incorrect. One site, Gunn Close, off London Road, is shown as having one dwelling, it now has 14. The adjacent site showing industrial buildings was demolished and already under construction with 101 dwellings on the site when the document was published

Strategic Housing Land Availability Assessment SHLAA 2012 Published January 2013 paragraph's 2.19 and 2.20. Note. Strategic Housing Land Availability Assessment SHLAA 2012. This document replaced



the 2009 version of which Essex County Council claimed they could not understand the detail. How can the public be expected to challenge RDC when such a statement is made by professionals in LA matters?

Appendix 14

In particular, this required a full Strategic Environmental Impact Assessment 1.13. para 1 and 2. Were the required assessments sufficient, given the lack of current flood, air quality and traffic assessments in the documents supporting these proposals?

Refer letters of objection see list as per appendix 1 letter number 39 Mr Ken Stanton C.Eng.M.I.Mech.E and letter number 47 Mr.A Buxton.

Also refer to *appendix 17* Report Air quality and Pollution

Appendix 15

SHLAA 2009 Appendix A (part 1)

Appendix 16

NPPF Section 10 para. 94 and 100. NPPF Decision Taking. Para 192 The population have a right to have crucial information e.g. Flood risk Assessment and Environmental Impact Assessment of all decisions taking by LA, this to include water and sewage issues.

Flood Risk and Water Management

Approximately one third of the proposed site for development is on Green Belt land that is subject to flood. It is clearly identified on the Environment Agency flood risk map as being at risk and local knowledge further supports this view of flood risk from the existing river and from surface water run-off.

We were unable to find or identify any document that provides information about or proof that an adequate assessment of flood risk has taken place other than an acknowledgement that some of the Green Belt earmarked is within the flood plain and any developer should only use it for appropriate development. It is also disconcerting that Rochford District Council provides no evidence of having undertaken a risk assessment as part of the Core strategy process and so we feel that the core strategy is flawed by this and so any subsequent proposals for the area under this plan are similarly flawed.

We believe that the absence of these plans mean that Rochford District Council will, unacceptably, require developers to provide appropriate flood defences as they are with other infrastructure but without a formal plan.

Sewage Treatment

Sewage disposal is also a major issue that has not been addressed within the planning process. We are advised that the pumps / pumping stations in the immediate area only just cope with the quantity of raw sewage currently being processed. 800 houses on top of the 101 at the Eon site will put an unacceptable pressure on the sewage disposal system and could in time become a serious health hazard.

The current situation is that raw sewage from Rayleigh is transferred via pumping stations to the Anglian water site at Watery lane in Hullbridge (this is known as Rayleigh West Sewage Treatment Works). It is well documented that Anglian Water and Rochford District Council have been inundated with complaints from the locality about noxious smells and Anglian Water are attempting to deal with this problem by utilising the use of lime to deal with the sludge that is causing the problem. This requires an increase in HGV tanker traffic using watery Lane to access the treatment works. These vehicles are too big to be safely using this access road in large numbers as will be the case. The pumping stations and the treatment works itself are struggling to keep up with the demand for sewage treatment in the area and this is made considerably more difficult by the additional houses currently being built.

Working on the principle that each household contains the national average of 2.2 occupants, the Eon site alone will add 404 people to the burden that the sewage plants are bearing, 829 further dwellings will therefore add 3316 more to the mix and this is an unacceptable load on an already struggling system. The sludge alone from this additional 3720 people will result not only in overload in the pumping



and treatment systems but in order to deal with the sludge, Anglian Water will require the use of HGV tanker traffic to deal with the sludge. These vehicles are too big for safe use on the access roads to the site and so there is a real issue of public safety.

Clearly development that impacts on the water companies ability to ensure public safety through effective sewage removal is not viable especially in the light of the impending handover of some services as required by the Section 42 Floods and Water Management Act that will undoubtedly impact on the water companies ability to deal with effluent effectively when they are already struggling to maintain the services that they already provide against the backdrop of infrastructure that now needs upgrading and replacement to ensure that the services currently being provided can be maintained.

Surface Water Flooding Risk

In the light of a lack of appropriate environmental impact planning in respect of the proposed construction of over 800 houses in West Rayleigh, the following observations are made:

The area around Rayleigh, Hullbridge and Wickford are known areas for flooding. The water table around London Road, close to where the development of 800 houses lies is known to have changed as gardens locally are waterlogged for long periods of the year, especially after heavy rain when it can take several days or even weeks for the surface water to dissipate.

Part of the problem is the clay that forms the basis of the soil in this area. While this heavy clay makes for good productive farm land, its ability to hold water in times of flood is not beneficial and locally, since the building of the estate at the back of Swayne Park, it has been very noticeable that the ground remains wet much longer than it did prior to that construction. It is therefore clear that water displaced by the construction several years ago has to go somewhere and London Road is at the bottom of an environmental canyon, so water naturally flows down into it creating instances of Fluvial flooding and this is clearly evidence during rainfall when rivulets are formed on Crown and London Hills, discharging water that the drains cannot cope with and creating a significant risk to road users on those stretches of road. The drain off channels are barely adequate to deal with the flow and this is further evidenced by how waterlogged the Grange Community field becomes after rainfall and the continual flooding of the Carpenters Arms roundabout and the London Road at Chase Hall with water from the adjoining fields and an overloaded drainage system conspire to place the roadway under several inches of water.. The water accumulating at this location takes several days and often weeks to completely dissipate.

Building on flood risk land is not an environmentally sensible route to take. Water displaced has to go somewhere and the area that it will naturally gravitate to is London Road, creating further problems with flooding and the associated damage and transport delays

Essex County Council in their flood risk planning state that they have a responsibility in terms of :

'Avoiding inappropriate development in areas of flood and coastal erosion risk and being careful to manage land elsewhere to avoid increasing risks'

In addition the Surface Water Planning Strategy provides the following definition of surface water flooding

The term 'surface water' covers flooding directly from rainfall, but it also includes flooding caused from rainfall in other ways including groundwater flooding, rainfall runoff and ordinary watercourses. Surface water flooding can occur when large amounts of rainfall cannot be absorbed into the ground, rivers or drains. When this happens, water will flow and accumulate on the ground, rather than beneath it. This type of flooding is typically localised and happens quickly after the rain has fallen, making it difficult to provide flood warnings to residents.

The area around London Road and Rawreth Lane are both subject to flooding based upon surface water but the real flood risk comes from the addition of the area at the Rawreth Lane end of the Green Belt as this is prominently marked on the regional flood maps. Clearly if the area of Green Belt earmarked for development is used, the push of surface water from the former fields would only be able to move laterally. This means adding water to the river channel that runs down from Rawreth to London Road



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via Cheapside East. This provides several locations for localised flooding and will add to the problems that are already experienced in the area.

Essex County Council as part of their flood planning identify the following factors with respect to environmental factors and development:

- *New development and changes in land use may lead to an increase in impermeable surfaces and therefore cause increased levels of runoff during heavy rainfall events*
- *Development may also lead to deforestation and general loss of vegetation cover, also causing increased levels of runoff during heavy rainfall events*
- *Over time deterioration in the condition and performance of existing drainage infrastructure and flood defence structures will increase future flood risk*
- *It is predicted that climate change and severe weather events will lead to more frequent and more severe extreme weather and therefore to more extreme floods with more serious consequences*

Rayleigh together Wickford and Basildon are listed as being a Tier 1 risk and so it is foolish to consider building on flood plain when clearly there is a risk to the environment, public safety and property, especially where there are brownfield sites available that meet the criteria and are proven to be safe from flood risk by virtue of site history.

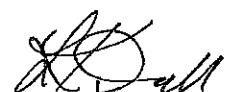
The area has experienced more instances of flooding in the past seven or eight years than previously and with climate change progressing at the pace that it is, this is only going to get worse. West Rayleigh is already at risk and any development on the proposed scale is an irresponsible action especially when suitable alternatives are available that have been refused on the flimsiest of grounds.

Surface water flooding as described above is caused principally by rainwater run-off from urban and rural land with low absorbency. Development such as that proposed is exactly that. Increased intensity of development in urban areas in general has given rise to land with a larger proportion of non-permeable surfaces than has been experienced before. This is especially a problem that is often exacerbated by overloaded and out-dated drainage infrastructure and pumps and pumping stations that are barely coping with the existing prevailing conditions. These circumstances, combined with intense rainfall, can give rise to localised flooding and an overwhelming of the attendant sewage disposal systems.

This sort of flooding often occurs outside of recognised floodplains and because it is caused by quite localised weather conditions it is very difficult to forecast however part of this site is recognised floodplain and so some prediction is possible. However, the onset of fluvial flooding can also be very rapid, and the level of flooding very severe. This was experienced in the UK in the summer of 2007 where much of the flooding experienced in Gloucestershire and Yorkshire was not directly caused by rivers but by surface water. Large volumes of rainfall early in the year saturated the ground and intense rainfall later caused both urban and rural areas to flood.

As a result, the Pitt Report, published following the flood events in the summer of 2007 draws attention to the high proportion of surface water flooding that occurred during that period, and states that the impact of climate change means that the probability of events of a similar nature and scale happening in the future is increasing. The report calls for improved modelling of all forms of flooding to enable better flood warning and planning and highlights the need for greater use of sustainable drainage systems (SUDs). We could find no evidence of adequate assessment in this respect being undertaken although mention is made of sustainable drainage systems.

A number of issues are relevant to this lack of planning and they include the factors that have been left deliberately vague in the Councils' documentation including the level of consultation that does not appear to have been undertaken, not only with local residents, who are most at risk of future flood or the breakdown of sewage and water services but also organisations that supply the services so that infrastructure matters can be addressed properly and their views on capacity sought. The insurance



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industry will also need to be consulted as increased flood risk brings with it attendant issues regarding being adequately insured following construction of a large development likely to bring attendant flooding problems.

Appendix 17

NPPF environmental para 165 EU Directive, . Strategic environmental assessment on the environment should be integral part of LA Plan. Do RDC have one? Have RDC got that information?

Report Air quality and Pollution

Air quality is a primary factor when considering the environmental impact of the proposed developments.

Rayleigh has been subject to air quality monitoring in recent years as the High Street area exceeded the annual concentrations of Nitrogen Dioxide permitted by law. Only the High Street and its environs were subjected to this type of testing.

In view of the intended use of the proposed sites in West Rayleigh, this means that any impact assessment for the proposed use of those areas lacks validity, especially in the light of the health risks posed by chemical pollutants from industrial processes, since all of the areas will produce a significant increase in pollutants. The prevailing winds around the proposed heavy industry site and that of the light industry site, both areas of manufacturing processes, are likely to impact directly on the residents of West Rayleigh to greater and lesser degrees depending upon wind speed and direction (especially where particulate matter such as that measured under PM₁₀ testing are concerned, where particulate matter bypasses the dead area immediately in front of the source and, travelling horizontally, will fall uniformly to concentrate and peak in a particular area before tapering off over a much wider field). Depending upon the types of industry this could be a significant problem for local residents and in particular the elderly and children who are a large group in this area. Industries such as those carrying out scrap and smelting operations, concrete and cement production and hot processes are likely to produce such pollutants.

In addition to the industrial processes, in excess of an average of 11000 vehicles per 12 hours daily currently use the London Road. The heavy and light industrial sites, the large concentration of additional housing and the relocation of the waste disposal site, all will significantly increase the use of London Road by traffic both in the form of cars and buses and heavy vehicles serving the industrial sites. Apart from the pollution aspects of this increase, this also increases the risk to the safety of local residents in terms of risk of traffic collision.

Nitrogen Dioxide (NO₂) is a colourless gas that is sometimes detectable by its smell, however, exposure to low quantities of this gas will dull the sense sufficiently that the likelihood of overexposure is increased. This gas, if inhaled in the long term is known to cause health problems including respiratory problems and reduced lung function. This is of a particular concern as the area has an abundance of elderly retirees and children, both of whom are likely to be negatively affected by the inhalation of this pollutant.

This gas is mainly caused by combustion engines and large industrial complexes such as power stations but it is also produced, albeit in smaller quantities by household appliances such as gas heaters and gas cookers.

Traffic is in this case a major factor in producing Nitrogen Dioxide and the increase in traffic on the London Road and the Rawreth Lane over the past ten years represents a significant health risk for residents living on or near those roads.

The recent study based on Rayleigh High Street by Air Quality Consultants for Rochford District Council showed that the levels of Nitrogen Dioxide exceeded the legal maxima of 40 micrograms per cubic metre over the year of the study with levels of NO₂ in the air being at a level of 44 micrograms per cubic metre for Eastwood Road/Websters Way and 41 micrograms per cubic metre for Eastwood Road / High Street.

A similar study was carried out on the Rawreth Industrial Estate (known as the West Rayleigh study) and was limited to the industrial estate. It was stated in RDC air quality studies that samples would be taken at the top of Victoria Avenue but no evidence has been seen that would confirm that this ever took place. This test however was in terms of PM₁₀ particulate matter (ie harmful fine dust) and not Nitrous Oxides or Nitrous Dioxide.



In terms of the development proposed for West Rayleigh, there is no evidence that, despite the fact that the majority of NOx and NO₂ is produced by motor vehicles and that both Rawreth Lane and London Road are significant radial feeder roads with heavy traffic concentrations, often with standing traffic* it is likely that concentrations of NOx / NO₂ are higher than would be desirable in a residential area. This however has not been studied and so any environmental impact statement is by default negated. The Rayleigh studies did not provide for sensor equipment to be installed in West Rayleigh other than to deal with particulate matter emanating from the Rawreth Industrial Estate. No sensors were placed on the London Road beyond Crown Hill despite the road network from Rayleigh Weir being measured up into the High Street and covering Eastwood Road and Hockley Road. It is therefore suggested that the effects of airborne pollutants especially those harmful to health such as NOx / NO₂ should have been studied before any commitment made by Rochford District Council to include this area of Rayleigh in its Core Strategy or the subsequent planning documents. On this basis alone, the Core strategy and subsequent documents in respect of any impact statement are seriously flawed.

*Traffic surveys undertaken by Rawreth Parish Council and the Rayleigh Action Group in the absence of a traffic survey by Rochford District Council, or Essex County Council whose last published survey was in 2005 show significant use of both road at all times during each of the 12 hour studies).

Appendix 18

Report Housing Development and Green Belt

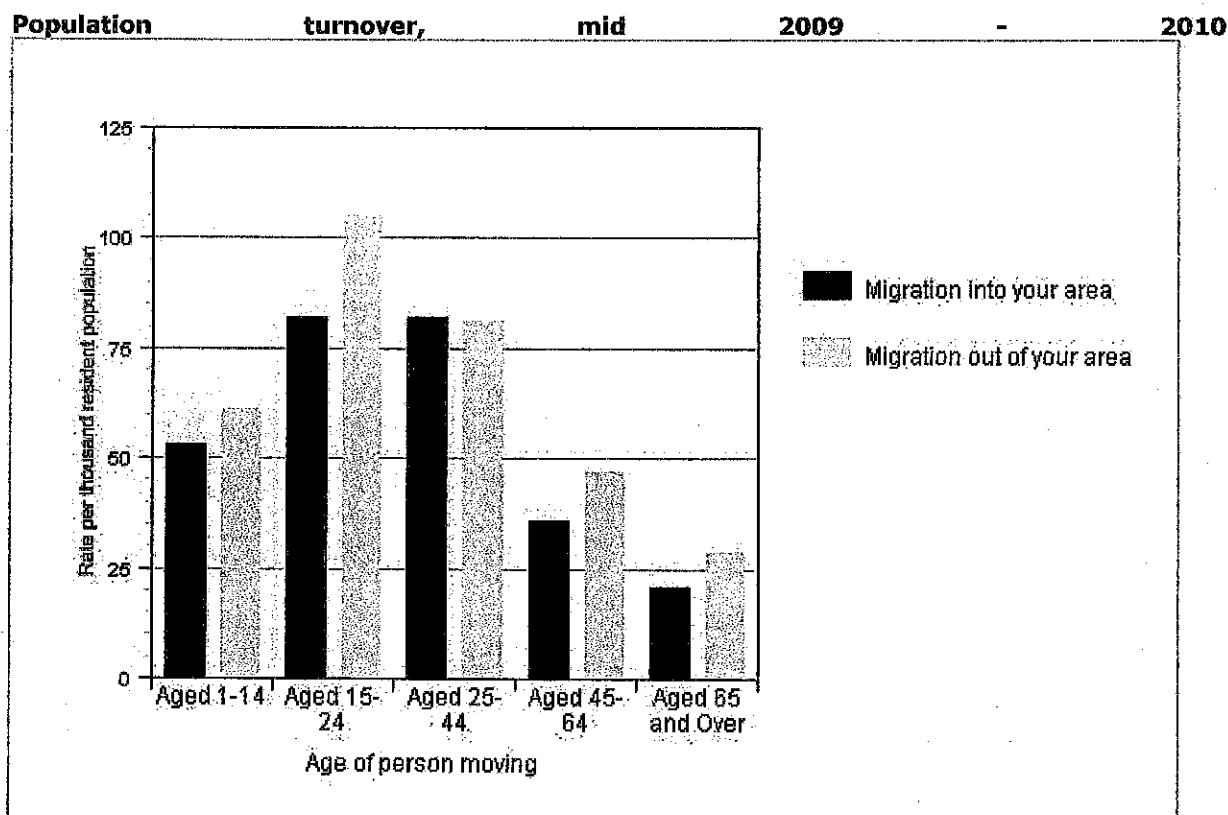
There is a question as to why this level of house building is required in this area as a whole. Arguments have been put forward that this is to ensure that our children have somewhere affordable to live. This is a spurious argument given that the houses for sale in London road, on the day of this being written, are significantly more costly than local young people could afford and so who benefits? Clearly it is people coming into the district that will occupy such properties and not local people. The lack of social housing is the significant problem here not speculative build and including a proportion of 'affordable' housing in the mix while using tenure neutral construction is an irrelevant sap to the locality.. The statistics for the area and Rochford as a whole show that population movement is comparatively static. Indeed the number of households identified by the 2001 census shows that by 2011 an increase of only 238 took place in Rayleigh over that period. Of course there are peaks and troughs but the fact remains that the population growth is not spectacular as the number of houses allegedly 'required' indicates. For Rochford as a whole, the population change from the 2001 census to the 2011 measure is only 791.

Accommodation Type 2001/2011 Census

		Rayleigh 2001	Rochford 2001	Rayleigh 2011	Rochford 2011	Rayleigh	Rochford
All Household Spaces	Count	3134	32773	3372	33564	238	791
In an Unshared Dwelling	Count	3130	32689	3372	33545	242	856
Unshared: House or Bungalow	Count	2929	29338	3061	29708	132	370
Unshared: House or Bungalow: Detached	Count	944	10772	1027	11155	83	383
Unshared: House or Bungalow: Semi-detached	Count	1464	15915	1487	15864	23	-51
Unshared: House or Bungalow: Terraced	Count	521	2651	547	2689	26	38
Unshared: Flat, Maisonette or Apartment	Count	196	2874	307	3368	111	494
Unshared: Flat, Purpose-Built Flats	Count	176	2405	289	3020	113	615
Unshared: Flat, Part of a Converted or Shared House	Count	4	214	8	159	4	-55
Unshared: Flat In a Commercial Building	Count	16	255	10	189	-6	-66
Unshared: Caravan or Temporary Structure	Count	5	477	4	469	-1	-8
Shared Dwelling	Count	4	84	0	19	-4	-65

Source Office of National Statistics

This may be challenged on the grounds of perceived need but taking a snapshot of population change during the period 2009-10, it is evident that Rochford is a net exporter of population with migration out of Rochford during that period alone being greater for all age groups except that of 25-44 where the inward and outward migratory patterns show that inward migration was marginally higher than outward migration.



Clearly populations shift dynamically but statistics show that the migratory patterns for Rochford are largely stable so the need to build speculative housing on such a large scale and in the largest and most desirable town in Rochford is even more confusing. The fact that Rayleigh is a net exporter for employment in that the majority of its economically active population commutes out of Rayleigh to places like Southend, London, Chelmsford and the like means that speculative build is not likely to meet a local market condition but create an artificial demand that will attract people wishing to commute, that is, inward migration to the town that already has the largest population and whose infrastructure is already under considerable stress.

In addition, prior to the original Core strategy document, unfettered estate building took place in Rayleigh having a significant impact on our town and the opportunity to access services. This was not taken into account and neither were around 360 houses, including the 101 currently being built on London Road, that have been built since the strategy was put in place by Rochford District Council and its Planning Department. It is hard to understand why these houses have not been taken into account by the strategy until you realise two factors

1. The Planning Committee comprises ALL of the councillors. This means that with a 31 to 39 split along party lines, 8 councillors have little say in what goes on in their own area and it appears that it is no coincidence that almost all of the development has been shoehorned into areas that are politically under the 8 minority councillors.
2. The Council receives generous payments from the Government under the New Homes Bonus Scheme and it is thought that this is the incentive to continue with the high building volume and pursuing the large single site model that is so attractive to developers. This is despite the considerable amounts of Brownfield land currently available, and soon to be available in Rochford (eg HMP Bullwood Hall) that would be eminently more suitable for development and have been rejected on the flimsiest of grounds.

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The ingress and egress statistics mentioned above support our assertion that Rayleigh does not need these additional houses as the migratory patterns are in fact very low. In addition to this, local estate agents at any one time will show anything between 25 and 100 properties for sale that are existing stock recycling within the town. Given that the population turnover is so low, it is our contention that these older properties changing hands, meets the need of the local population and so any further development is unnecessary other than the provision of affordable social housing for the children of the local population that cannot afford to buy here.

Education

A specific issue of the housing development is infrastructure. The local schools are at capacity. The plan states that a primary school will be provided as part of the development, despite the fact that there is some capacity for expansion at the primary school in Rawreth but with the closure of the Deanes School currently being mooted, the children displaced from that school have no option but to be distributed to any available places at Sweyne, Fitzwymar and Greensward schools as the King John School has no capacity. 829 houses will if the national average is a guide, produce some 1658 children. That's the equivalent of two primary schools and one secondary if a 50/50 split is assumed in terms of age but given the impending closure of Deanes, the displaced children will require the equivalent of two secondary schools not one, that isn't even planned for.

Traffic and other infrastructure

Traffic increase has been dealt with elsewhere but the issue of roads remains. With the house building proliferation in the past decade, estate road infrastructure has been developed to take account of the users of those estate roads but there has been no major infrastructure road building to compensate for the levels of traffic the additional properties have already created. This will be further exacerbated by the lack of road construction planning in the strategies. Simply mentioning that developers would have to provide the infrastructure is not sufficient and without the necessary traffic surveys having been undertaken on these roads, the already congested ingress and egress routes will be further compromised as the developers interest lies within the estates that they create for sale and providing an arbitrary roundabout on an already congested road will cause significant chaos and misery for those dwelling further up both London Road and Rawreth Lane. This is yet another example of the lack of planning and consultation that has gone into this strategy.

In addition, infrastructure concerns relate to the strain on local facilities that the additional 829 houses will bring. It is currently very difficult to access healthcare, doctors, dentists and the like due the number of people living in the town and the availability of such services. There are serious concerns about the effect that such a large number of new houses and the lack of infrastructure planning will bring.

Appendix 19 **Objection Policy BRF4**

Appendix 20
Localism Act 2011 Duty to consult. Refer letters of objection see list as per appendix 1 letter number 82 Messrs Tyson and letter number 83 Mr Barry Robins of Flowline Ltd.

Lack of consultation re. Cost analysis - The objector regards the Policy NEL2 to be unsound due to serious doubts about the viability of the plans to transfer the Heavy Industrial companies located on BFR4 to this location. This is due to the RDC's failure to seek information from those that will be seriously impacted by this proposal. Refer to objection re. BFR4.

It is possible that companies, currently operating from Rawreth Industrial Estate, will choose to locate elsewhere entirely. They might decide to close or seek an enterprise zone that would give them substantial advantages, to relocate. No one can quantify these possibilities because during the full seven years these proposals have been under consideration by RDC, no one thought to speak to or contact the business owners. Cavalier is too mild a word for this omission on the part of RDC. Refer Localism Act 2012 Local Authority have a duty to conduct 'substantial' consultation.

Appendix 21



Traffic Management

The A129 London Road and the Rawreth Lane are heavily congested roads. They serve a broad access area, ranging from Rayleigh town centre and environs, Wickford and its environs and traffic wishing to use it as a through route to Hawkeley, Hockley and Rochford.

It is acknowledged that the A129 is a busy route with in excess of 25000 vehicles per day at the last survey in 2005. It is regularly backed up from Rayleigh High Street to Victoria Avenue and from The Carpenters Arms roundabout to Victoria Avenue traffic lights. This is especially the case during the rush hours of 7 – 9 am and 3 – 7 pm. Outside of these times traffic is described as 'heavy'

Rawreth Lane similarly carries a heavy traffic loading throughout the day and this has been exacerbated by the building of houses in this area during the past ten years., In addition, the light and heavy industrial parks together with the Makro and Asda sites mean that as well as cars and motorcycles, heavy lorries and vans use this narrow road at all times of the day.

The Plan is flawed in that no traffic management survey has been published for the area since 2005 and it is self-evident that with unfettered development occurring in Rayleigh and surrounding areas, this has had a significant impact on traffic numbers since 2005.

In order to quantify the traffic levels for both of these roads in the absence of a formal traffic census by the local authority or the county council highways department two traffic surveys were carried out. The first was by Rawreth Parish Council

The survey results are as follows:

Rawreth Lane

"Traffic Survey Thursday 25th March 2010.

Location Beeches Road, held between the hours of 7am and 7pm.

	WESTBOUND	EASTBOUND
7-9 AM	732	333
9-11 AM	250	322
11-12 PM	130	147
12- 1 PM	131	140
1-2 PM	128	150
2-3 PM	118	195
3-4 PM	120	247
4-5 PM	131	384
5-6 PM	171	595
6-7 PM	111	335
Total	2022	2848

The odd statistic from the figures show eastbound traffic is running at about 220 vehicles per hour whilst westbound is averaging at only about 170 vehicles per hour. This may be because of the congestion on Rawreth lane encourages more cars going east. There were considerable numbers of overweight vehicles mainly large transit type with double wheels or long wheelbase."

(Source Rawreth Parish Council 2013)

This makes a total of 4870 vehicles recorded over one twelve hour period.

On the assumption that 4870 is a constant and given that the road remains a busy through-route due to increased local use at weekends to access leisure facilities and the Makro and Asda superstores, a figure of 75% of the daily total is applied to the weekend.

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As a result the weekly use of this road rises to 31655 vehicles on a road that is narrow, poorly maintained and congested to the point of stationary traffic daily.

London Road

In the absence of a formal survey of London Road, an informal survey was carried out in July 2013 covering a period before the end of the school year and the commencement of the school holidays. This survey was taken over a 12 hour period using an extracted sample method of quantitative research. That is, samples of short periods (set 5 minute vehicle count with random 1 minute samples to confirm accuracy of data) taken over a set twelve hour period and on four days over a weekend.

The following is a representative sample of traffic covering the rush hour / school run periods and the quieter periods during the day and in the early evening. It was taken at a fixed point and therefore cannot be complete data as the sample simply indicates the number of vehicles passing that fixed point on the two main traffic lanes. It does not include vehicles entering or exiting London Road from either of the ingress/egress points that do not pass the fixed point. Similarly, the fixed point was located facing a recessed service road for local shops. Vehicles enter and exit this location at a point equidistant from the survey point and so were not included in the survey unless they passed the survey point. This means that the data set provided is intentionally flawed due to the non-inclusion of an unknown number of vehicles having not been included and the time period being limited to 12 hours in a 24 hour day.

The data resulting therefore indicates that this is a minimum level of traffic flow for this radial feeder road. It does not take into account projected traffic flows from the new development of 101 houses at the former Eon site and any other proposed increase in traffic loading.

Traffic survey outside 122 London Road Rayleigh
19 July to 22 July 2013

Date	19.07	20.07	21.07	22.07	Total	av 5	av hr
Time							
7 - 7.05	84	87	63	98	332	83	996
8 - 8.05	101	103	71	106	381	95.25	1143
9 - 9.05	88	79	53	89	309	77.25	927
10-10.05	76	68	75	78	297	74.25	891
11-11.05	65	66	81	73	285	71.25	855
12-12.05	62	71	89	77	299	74.75	897
14.55-15.00	87	93	84	83	347	86.75	1041
15.55 - 16.00	91	104	76	85	356	89	1068
16.55 - 17.00	89	98	78	97	362	90.5	1086
17.55 - 18.00	103	101	63	104	371	92.75	1113
18.55 - 19.00	94	96	59	93	342	85.5	1026
			average 12hr day				11043
			average 12 hour x 7 day week				77301
			average 12hour day per annum				4019652

note :

does not include traffic entering or leaving London Road that does not pass 122,

does not include any vehicles entering the slip road to local shops

does not include vehicles travelling on London Road between side streets but not passing 122.



The failure of Rochford District Council to include a Transport Risk Assessment or a Traffic Impact Statement into the Core Strategy or its subsequent documentation means that the current plan is fundamentally unsound and is wholly uninformed as to the likely impact of road safety, noise and harmful pollutants that such planning will present.

As has been identified above, the current traffic is heavy often resulting in stationary traffic along the whole of London Road (and the same at Rawreth Lane) creating a pollution problem for all residents (eg it is impossible to watch television with the windows open due to the levels of noise on London Road).

The area has a large number of elderly people and young children and the pollutants from vehicles are a significant hazard to their health and development as has been shown in a variety of studies on child development and proximity to heavy levels of road traffic and for those with bronchial and similar problems.

To add in the likely equivalent of 1600 vehicles from the proposed housing development together with the number emanating from the 101 new build properties already under construction at the Eon site, plus an unknown number of vehicles both in the form of cars, vans and heavy vehicles utilising the A1245, A129 and Rawreth Lane to access the industrial sites makes these proposals not only unsound but fundamentally dangerous to the population at large.

The lack of an environmental impact plan together with appropriate air quality surveys (Crown Hill being the closest sensor or Rawreth Industrial Estate) for an area that is in effect an environmental canyon through which a minimum of 11043 vehicles per day currently travel is quite frankly irresponsible

In addition to this, the lack of a road infrastructure plan further complicates the case for the proposed developments being sound.

Therefore it is suggested that In view of the lack of adequate transport planning alone, this plan is deeply flawed and will be extremely detrimental to the local community, who have had little or no involvement in this process.

As a result of the relocation of the recycling centre from the town, it is a 6 miles return trip from Rayleigh Town Centre, to the proposed re-cycling facility, any gains to the environment will be discounted, by the increased traffic movements to and from this remote location.

Objection 29022 Mr Roy Lewis ESSEX COUNTY COUNCIL Powerful statement stating clearly the ECC do not support the NEL2 Policy due to traffic issues.

Appendix 22

Essex County Council does not support the allocation of this site for employment on highway grounds (comment 166 of Appendix 3 consultation statement and comment 143 relating to GT1). Refer to appendix 21 regarding objection 29022.

Appendix 23

Letter RDC Chief Executives Office 1 August 2013

Appendix 24

DECISION TO REFUSE (application 10/00582/COU) on appeal APP/B1550/A/11/2151221/NFW. The planning application was refused for the Cherry Hill Farm, Traveller site, Rawreth (application 10/00582/COU) was the possibility of traffic hazards on the A1245.

This is a much less congested stretch of the road, situated further from a junction. Thus there appears to be confusion, or perhaps a lack of due diligence, by RDC in their lack of consistency, especially concerning the issue of road safety on the same road.

The objector considers that the restrictive area, due to the roads and railway line restraints on the boundary, will make it impossible to afford safe ingress and egress from the site, for the volume of traffic envisaged.

Appendix 25

Refer (appendix 1) Policy SER1.



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Appendix 26

Reference NPPF numbers 17, 19, 20 and 21.

Appendix 27

Objection 28923 concurring with this conclusion.

Appendix 28

See objection letter number 83 (*appendix 1*), from Flowline, Mr Barry Robins.

Appendix 29

Refer NPPF 211, 212, 213

Appendix 30

The eastern area of NEL1 is virgin farmland with electricity pylons low overhead. (Developers have suggested these pylons could be too low for the industrial units suggested for that site).
See Objection no.28906 claiming any limited office requirement could be situated on an alternative site.

Appendix 31

Protect character of district, NPPF section 11 "Conserving and Enhancing the Natural Environment" paragraph 109 and 111. Section 12 "Conserving and Enhancing the Historic Environmental Character of the District" paragraph 126, 155 157 and 158.

Appendix 32

Site no. 73 in the Call for Sites 2007. Hambro Nurseries brownfield site.

Appendix 33

Appendix NPPF para. 32 "Lack of Transport Assessment".

Appendix 34

Objection 29022 Essex County Council Mr Roy Lewis serious statement on highways issues making clear this site is not suitable for the purpose suggested for both NEL2 and GT1. Refer (*appendix 21*).

Appendix 35

Refer (*appendix 20*)
NPPF Business 160

Appendix 36

Refer (*appendix 1 & 35 - NPPF Business 160*)

Appendix 37

NPPF Section 32 A full Traffic assessment Section 36 LA Act 'RDC should have a travel plan for significant developments.

Appendix 38

Refer (*Appendix 20 & appendix 35 - NPPF Business 160*)

Appendix 39

Photograph available if required

Appendix 40

Statement page 83 LDF ASD.

Appendix 41

NPPF Section 11 Preserving and Enhancing the Natural Environment (109), Section 17. LA must plan 'recognising the intrinsic beauty of the countryside'.

Appendix 42

BFR4

Appendix 43



Objection Number 28594 – Linda Kendall
POLICY SER1 / POLICY NEL2 / POLICY BFR4 / POLICY NEL1
L.D.F. Allocation Submission Document November 2012

Due to time constraints the objector has not checked every page of this document for any similar errors e.g.

- 1) Key Diagram (page 13) has omitted the proposed Industrial Area NEL2 and the proposed Traveller site GT1 this Diagram is the first that the public would see when reviewing the whole process.
- 2) The Proposals Map page 163 site GT1 has further been, obscured, by the broad felt tip marker, outlining the district which makes it impossible to identify.

Reference. NPPF section 12 (157) Town and Country Planning Act (Local Development) (England Regulation) 2004

Appendix 44

They have been over-ruled due to being a minority on the Council.

Appendix 45

Council demographic is 31 Conservative, 4 Libdem, 2 Green Party, 2 Residents Independent, total 39 Councillors.

Appendix 46

Objection 3356 Cllr. Chris Black Proposals will mean increase in population in Rawreth of 270%

Appendix 47

Letters no. 39 Mr Ken Standing and no. 47 Mr Alan Buxton with data. 34 objectors registered out of a population of 83,000

Appendix 48

Chris Black's email

Appendix 49

Policy. NPPF 112 Food production land must be protected (Note. Natural England claim the most recent grading of this land was in 1977 by MAAF prior to the current grading system)
Natural England Has RDC asked for a Consultation Development Management Procedure Order? Ref. Natural England TIN049
Rawreth Parish Council claim agricultural land is protected grade 2/ 3A. See extract for letter to Rawreth Parish Council from RDC dated 9th July 2011 Paragraph 11

Appendix 50

Photograph available on request apologies printing issue.

Appendix 51

Objection 28926 that the 'limited' need for office accommodation could be met elsewhere.

Appendix 52

M D Smith Hambros Nursery site no. 4293 in the call for sites. This site was dismissed to 'Protect the Greenbelt', it is a former industrial nursery. See ariel photograph@@@@@

Appendix 53

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Policy NPPF section 9 para 79, 80, 87 Section 11 109, 111,

Appendix 55

Policy NPPF 17 LA 'should prefer land of less environmental value'.

APPENDIX (23)



Chief Executive
P Warren, BA(Hons), MRTPI, DMS

Mrs L Kendall
4 Lubbards Close
Rayleigh
Essex
SS6 9PY

Ask for: Paul Warren
Ext: 3005
Tel: 01702 546 366
Email: paul.warren@rochford.gov.uk

My Ref: PW/Kendall

Date: 1 August 2013

Dear Mrs Kendall

Request for information under the Freedom of Information Act

Thank you for your letter dated 8 July 2013, seeking details as to the costs around the Development Plan/Local Development Framework process since 2006. The process covers a variety of plans, plan stages, supporting documents, research and the like, not to mention the costs of planning inquiries, legal challenges, etc. In summary we have spent just over £2.1 million since 2006/7. However, we have received almost £1.2 million in specific grant aid to assist with various aspects of the process and thus our net expenditure over the period has been approximately £900,000.

In connection with any disposal issue, I can confirm the Council has not commenced marketing or negotiations for the sale of its land holding at the present time. Our focus at present is on ensuring the planning policy position is confirmed through the inquiry process into the Allocations Plan. The Council is required to obtain best value for its assets. How this is achieved depends on the particular circumstances of each case and could involve for instance, independent valuation and negotiation, sale through the open market or by auction.

The recreation ground, together with the adjoining areas identified for development, will have a value as residential land although the infrastructure costs, including roads, community facilities, relocation of the Sports Club, etc, will be factored into any value.

Yours faithfully

A handwritten signature in black ink, appearing to read "Paul Warren", written over a horizontal line.

Chief Executive

A handwritten signature in black ink, appearing to read "Paul Warren", written below the Investors in People logo.

Appendix 35

Refer (*appendix 20*)
NPPF Business 160

Appendix 36

Refer (*appendix 1 & 35 - NPPF Business 160*)

Appendix 37

NPPF Section 32 A full Traffic assessment Section 36 LA Act 'RDC should have a travel plan for significant developments.

Appendix 38

Refer (*Appendix 20 & appendix 35 – NPPF Business 160*)

Appendix 39

Photograph @@@@

Appendix 40

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8/8/13

Print

Subject: Fwd: Something you sent a week ago....

Info requested.

From: cripssjimpat@aol.com (cripssjimpat@aol.com)

To: linda.kendall1@yahoo.co.uk;

Date: Thursday, 8 August 2013, 18:17

Appendix (48)

Sent from my iPad

Begin forwarded message:

From: Chris Black <clrchrisblack@gmail.com>
Date: 8 August 2013 18:03:22 BST
To: Cripssjimpat@aol.com
Subject: Re: Something you sent a week ago....

Hi Jim.

OK, I understand the question a bit better now. The results of the last consultation were not discussed by the Local Development Framework Sub-Committee, let alone discussed by Full Council! The results of the consultation - every response - would have gone to the inspector though.

The latest consultation, together with sites, was vote through at Full Council on Nov 27th 2012:

<http://cmisrhc.rochford.gov.uk/cm5/Meetings/tabid/73/ctl/ViewMeetingPublic/mid/410/Meeting/4156/Committee/782/SelectedTab/Documents/Default.aspx>

Does that help?

Best Wishes
Chris

On Thu, Aug 8, 2013 at 4:18 PM, <Cripssjimpat@aol.com> wrote:

OK Chris, to be quite clear, we understand that the last consultation wasnt brought to the full Council - which is against the policy of the Council.

So we need the record checked so, when was the last consultation and what was the result of the Full Council?

Did it come back to them ALL before being put in submission file to the Inspector?

Did the 2010 consultation go to the full Council before submission to the Planning Inspector (Laura Graham) who decided the Core Strategy?

Finally -did the final consultation concerning the choice of sites finishing in Jan 2013, go before the Full Council?
Thanks - JIM.



Subject: RE: LAND GRADE

From: Peter Scott (scott1e@hotmail.com)

To: linda.kendall1@yahoo.co.uk;

Date: Tuesday, 13 August 2013, 11:21

9 July 2011 letter to RDC from RPC states

Page A1-11 Location 7 Land to the north of London Road (Rayleigh)

1. Balanced Communities states that the quantum of development that can be delivered in this location provides sufficient economies of scale to fund/develop facilities required by the community. These facilities are stated as including a primary school, public open space and other community facilities. Within walking distance of the proposed site is the Parish School of St Nicholas. The school has planning permission to double in size allowing it to take in the region of another 100 pupils, in addition other schools in the surrounding area have places available, therefore the need for a new primary school has not been established and an evidence base has not been provided. UNSOUND. In addition west Rayleigh and Rawreth are very fortunate to have a number of open spaces available to them, Swayne Park, Rawreth Playing Fields, Rawreth Community Garden and the Grange open space, all are within walking distance of the site to the north of London Road so again there is not evidence to support the need for a further open space. Council are of the opinion that the facilities that could be delivered from the economies of scale for this proposed development are not needed and should not have been considered as a contributory factor in choosing this site as a preferred option.

11. Land and Soil. Land to the north of London Road is stated in the SA as being grade 3 agricultural land. Council suggest that the land is grade 3A agricultural land and as such under PPS7 comes under the same classification as grade 1 and 2 in that it should be protected.

ge A1-11 Location 7 Land to the north of London Road (Rayleigh)

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[Handwritten signature]