

Inspector 's Examination in Public September 2013

EXAMINATION OF THE ROCHFORD DISTRICT ALLOCATIONS SUBMISSIONS DOCUMENT  
SEPTEMBER 2013

HEARING STATEMENT OF THE HANOVER LAND TRUST  
REGARDING PLANNING POLICY SER6B AND ALTERNATIVE SITE 17

Appertaining to the Examining Inspector Mr David Smith 's Issues and Questions ( Final Version )  
Scheduled for examination under Issues 1&2, Planning Policy SER6b South West Hullbridge,  
at The Rayleigh Civic Suite, AM Wednesday 4th September 2013

INTRODUCTION

The Hanover Land Trust is a private family Trust and our Representation, No.29006 contends that Planning Policy SER6b as it stands is in principle unsound with regard to the following;-

- a ) That SER6b is not positively prepared,
- b ) is not justified,
- c ) is not effective,
- d ) is not consistent with Government policy,
- e ) and is in contravention of some of the Rochford District Council 's own tenets and planning policies.

The numbered statements have been set out for clarity and succinctness, in support of our viewpoints and to substantiate the perceived, stated planning deficiencies of SER6b and the benefits of utilising the alternative Site 17. ( See attached plans A,B,C & D on pages 7, 8, 9 and 10 respectively.

The Hanover Land Trust responds firstly to the Examining Inspector 's relevant Issues and Questions Report, Final Version dated 26th June 2013 as follows:-

ISSUE 1

ii and iv ). The policies are unduly prescriptive and under current Government aspirations for future housing such land should be made more readily available for implementation rather than be restrained by a long-term timetable. Therefore, it is considered the proposed allocation scheduled under Policies SER6b and SER6a does not allow for sufficient flexibility.

vii ). This representation strongly supports Site 17 as an alternative or supplementary site within Policy SER6 for reasons detailed and expressed in Statement numbers: 1, 2, 3, 4, 5 and the additional comments on Plans A,B,C and D.

viii ). Demand for affordable housing for young people particularly with family aspirations in tandem with other accommodation seeking sections of society has increased since the Core Strategy quantum for housing and allocations were decided.

ix ). The overall impact on highway capacity has not been adequately addressed as there has been no formal comprehensive assessment undertaken.

## ISSUE 2

Some of the allocated housing sites may not be deliverable within the proposed phasing for various unforeseen reasons unlike Site 17. Therefore it is reasonable to regard some chosen sites as inconsistent with some aspects of National Policy by possibly remaining unfulfilled sites.

### Questions (for all sites/locations ):

- i ). SER6b is not deemed fully justified when compared to Site 17.
- ii ). Deliverability of SER6b is an unknown factor concerning land ownership issues and the potential infra-structure constraints (particularly surface water drainage ) and would be better accommodated by including Site 17 within SER6.
- iii ). The site boundaries of SER6b are poorly defined, potentially weak, presenting a clear threat to the adjoining greenbelt land to the west unlike Site 17.
- iv ). ( See Issue 1, viii above ).
- v ). Decontamination could be a disadvantageous factor.
- vi ). If SER6b is found to be unsound this could be somewhat mitigated by including Site 17.

### Questions (for specific sites/locations ):

#### Hullbridge

- iii ). Under SER6b can the necessary highway and other infra-structure ( drainage and sewerage ) be adequately provided having regard to the seasonal flooding along Watery Lane. SER6b should be seriously reviewed on the grounds cited in the following statements.
- iv ). Direct access to Hullbridge centre using the substandard roads to the north and east of SER6 will place an unnecessary and undesirable burden on these roads which could be mitigated by up to a third by the inclusion of Site 17.

v ). If SER6a or SER6b are found to be unsound inclusion of Site 17 would render a more favourable integration into Hullbridge by being in closer proximity to several significant public facilities as well as being serviced on two sides by the main , existing public transport route. ( See Plan B ).

---

To further substantiate the foregoing comments/statements The Hanover Land Trust wishes to express the following cross-linked statements within the remit of Representation No.29006 as follows.

### 1. REASONS FOR UNSOUNDNESS

1.1. A significant portion of SER6, designated SER6b is situated on land within the neighbouring settlement of Rawreth, outside the geographical town boundary of Hullbridge. This is something of a planning aberration and some clarification is required here, will this part of the development be assigned Rawreth or Hullbridge postcodes? If the former this contravenes the Council ' s own policy and tenet of avoiding coalescence of settlements. If the latter, this too contravenes Council policy as part of Hullbridge will actually be in Rawreth. ( See Plan A ). This problem could be somewhat alleviated by the substitution of Site 17, which is in Hullbridge and is more conveniently situated than SER6b to support the important infra-structure necessary, as demonstrated elsewhere in this Examination Statement. ( See Plans A, B and C ).

1.2. There is a lack of Road Traffic Study Assessment for SER6 in relation to the outdated and inadequate configuration of existing roadways forming the area of the main access junction of the new development at Watery Lane and Lower Road including any new roads which will be required.

1.3. SER6b is not justified, being sited on aesthetically superior greenbelt land instead of first utilising less attractive greenbelt land such as Site 17. This is in contravention of the Council ' s Planning Policy GB1 ( extract ) which states , "We will seek to prioritise the protection of greenbelt land based on how well the land helps achieve the purposes of the greenbelt. Also the need to prevent the coalescence of individual settlements in order to help preserve their identities will be given particular consideration ". Respective site visits to SER6b via Windermere Avenue and Site 17 from Lower Road and Hullbridge Road are respectfully recommended. ( See Plan A ).

1.4. Large tracts of SER6b are too remote from some of Hullbridge ' s facilities unlike Site 17 which if included in Policy SER6a or SER6b would make the development more sustainable and coherent by straddling the main public transport route into Hullbridge and Rayleigh centres ( see Plans A & B ).

1.5. Site 17 and its attributes was submitted during the various consultation stages of the Core Strategy and was identified by the Council as a component part of Preferred Option SWH4 over an extended period. However, an oversight in the Council ' s planning assessment ( Evidence Base ) came to our notice by a communication dated 26th October 2012 from the Council ' s Senior Planner

whereby it was stated that Site 17 did not contain any brownfield/whiteland and by telephone that two former planning consents granted on Site 17 ( one of which had expired ), would not be considered on a supporting evidence basis, thus negating what should have been regarded as positive attributes. From the Council 's point of view the brownfield/whiteland issue may have arisen when a former Senior Planning Officer since departed, informed the Trust upon enquiry that the area of brownfield/whiteland within Site 17 had been removed from the District Plan by " cartographic error ". At the time ( 2008 ) the Trust 's Solicitors were informed in writing by the Officer that this mistake would be rectified. Beyond this assurance no further confirmation was sought or received and it was accepted that the Council Officer had acted. However, a further communication dated 15th November 2012 from the Head of Planning and Transportation finally admitted the existence of the area of Whiteland which at that time would have made it too late to have had any influence on Policy SER6. Due to the above cited, earlier communication of 26th October 2012, we consider these attributes, which were included in all our past submissions and representations to the Council, were not fully considered in the Council 's documentary assessments or Evidence Base when deciding the final configuration of Policy SER6.

## 2. REASONS FOR SER6 NOT BEING JUSTIFIED, POSITIVELY PREPARED OR EFFECTIVE

2.1. During the evolution of the Core Strategy it was recognised by the Council and private professionals that it would be logical to include Site 17 in the future development at Hullbridge within Policy SER6 to support a new roundabout and drainage infra-structure at the possible cross road junction to be formed by Lower Road, Hullbridge Road, Watery Lane and perhaps a new road to the north. SER6b cannot achieve this by its more distant location. ( See Plan C ).

2.2. The inclusion of Site 17 would also allow better accommodation for the Sustrans Bridleway/ Cycleway system from Hullbridge to Rayleigh, particularly for the proven bottleneck in Lower Road situated on the northern boundary of Site 17. ( See Plan C ).

2.3. Site 17 which was previously ' Screened In ' in the ADPD Evidence Base as part of the earlier Policy ' Preferred Option SWH4 ' and contains the existing main surface water drainage route from the hills to the east on the southern and western boundaries and the relief drainage route on the eastern and northern boundaries as will be seen from Plan B attached.

2.4. In planning terms the undeveloped part of Site 17 forms an obvious extension to the town development envelope as it already accommodates a section of existing residential development obtained via a previous planning consent fronting the southern side of Lower Road together with the Integral, adjoining brownfield/whiteland section.

2.5. There having been no definitive assessment or Road Traffic Study for ( SER6 ), Site 17 could form an important replacement or supplementary component to SER6, for example Site 17 if developed could contribute to the ECC Policy T6 Greenways supporting a reduction of car dependency by removing

some housing from SER6b to Site 17, the site being bounded by the existing public transport route on two sides.

2.6. A recent Government Statement has been made by which it is intended to utilise "every square inch" of every Brownfield/Whiteland area to minimise the release of superior quality Green Belt land. Therefore, Policy SER6b is inconsistent with Government Policy as Site 17 incorporates a modest, but conveniently situated area of Brownfield/Whiteland adjoining the existing residential development. As already stated, Policy SER6b as it stands does not accord with the Council's own Planning Policy GB1. Under National Planning Policy Guidance Note 2 (Green Belts PPG2) specific tenets include:- "To check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns from merging into one another; to assist in safeguarding the countryside from encroachment; to assist in urban regeneration, by encouraging the recycling of derelict greenbelt and other urban land" for example land like Site 17.

### 3. ATTRIBUTES OF SITE 17

3.1. Notwithstanding two previous successful planning consents since expired, Site 17 passed all previous Core Strategy planning criteria and as said was "Screened In" in November 2012 as a potential site for future residential development, but its inclusion has been displaced by the intended alternative release of visually superior Green Belt land to the south of Windermere Avenue, since designated SER6b. (See Plan A)

3.2. Having full regard to the alternative configuration of SER6 (formerly part of Preferred Option SWH4) in which Site 17 was included, (See Plan A), this latter site has the strong advantage of utilising the most ready access on both sides of the main road into and out of Hullbridge. (See Plans C & D). Site 17 is the most readily accessible component in The SER6 locality. As previously alluded to, this form of SER6 would have the advantage of retaining some of the more visually valuable Green Belt land south of Windermere Avenue which forms a major asset in the aesthetically pleasing open aspect of countryside. This would be better retained for recreational and/or leisure purposes. (See Plan A). (Respective site visits would provide clarity on this point).

3.3. Under the Core Strategy Local Development Framework H Appendix 1 pages 38-39, (South West Hullbridge) it is stated that among the infra-structure required it will be necessary to further assess and evaluate public transport enhancements, sustainable anti-flood drainage systems, public open space, play space, community facilities, leisure facilities, links and improved routes to the cycle network. When viewed in the overall context Site 17 is most appropriately situated to assist in providing a share of this programme. (See Plans A, B, C and D).

3.4. Also, under the CS-LDF page 19, it was published by the Council that the main drivers for Hullbridge were employment, leisure and retail opportunities in London, Rayleigh, Basildon and



Chelmsford. With the choice of rail connections of Battlesbridge, Rayleigh and Hockley, Site 17 is again, ideally better placed to engage in and deliver on this type of sustainability.

3.5. Site 17 is not contaminated and does not flood, unlike some areas of SER6.

3.6. In the ADPD-Discussion and Consultation Document-Sustainability Appraisal, the Council themselves can be quoted as follows:- "This site (Site 17) to the south is enclosed by residential Development to the east, Lower Road and Hullbridge Road to the north and west respectively and a golf course to the south. This enclosure would therefore ensure that a robust and defensible Green Belt boundary could be maintained in this locality".

#### 4. DELIVERABILITY

4.1. Site 17 is also better placed to assist ECC 's Policy T3 SERT ( South Essex Rapid Transport ) which clearly states that "planners should have particular care to make sure new development is well related to existing public transport where possible ". Site 17 readily fulfils this requirement by its location, much more so than SER6b.

4.2. Site 17 is in the single ownership of The Hanover Land Trust and together with our partner Swan Housing Association we are ready and able to engage in any Section 106 Agreement to facilitate a more comprehensive accommodation of alternative or supplementary affordable housing and infra-structure.

#### 5. SUMMARY

5.1. In summing up the foregoing reasons, which we trust have been sufficiently explained, it is shown why Policy SER6 as it stands is considered unsound, not positively prepared, unjustified , ineffective and partially contrary to Government Policy. It is hoped therefore, that the various attributes of Site 17 will be fully recognised and utilised to enhance a revised Policy SER6 for the better benefit and economic vivacity of Hullbridge itself and the Rochford District as a whole.

Lastly, we would also respectfully like to apologise for any perceived repetition of statement information as there are numerous interlinking and overlapping points of discussion which in setting out our views make this partially unavoidable.

Spencer Welsh,  
Managing Trustee, The Hanover Land Trust,  
1st August 2013

NOTE: The Hanover Land Trust will be represented by Mr Mathew Harper-Ward ( Senior Trustee ) under Representation No.29006, who will be present to speak at the Inspector 's Examination session to be held AM Wednesday 4th September 2013.

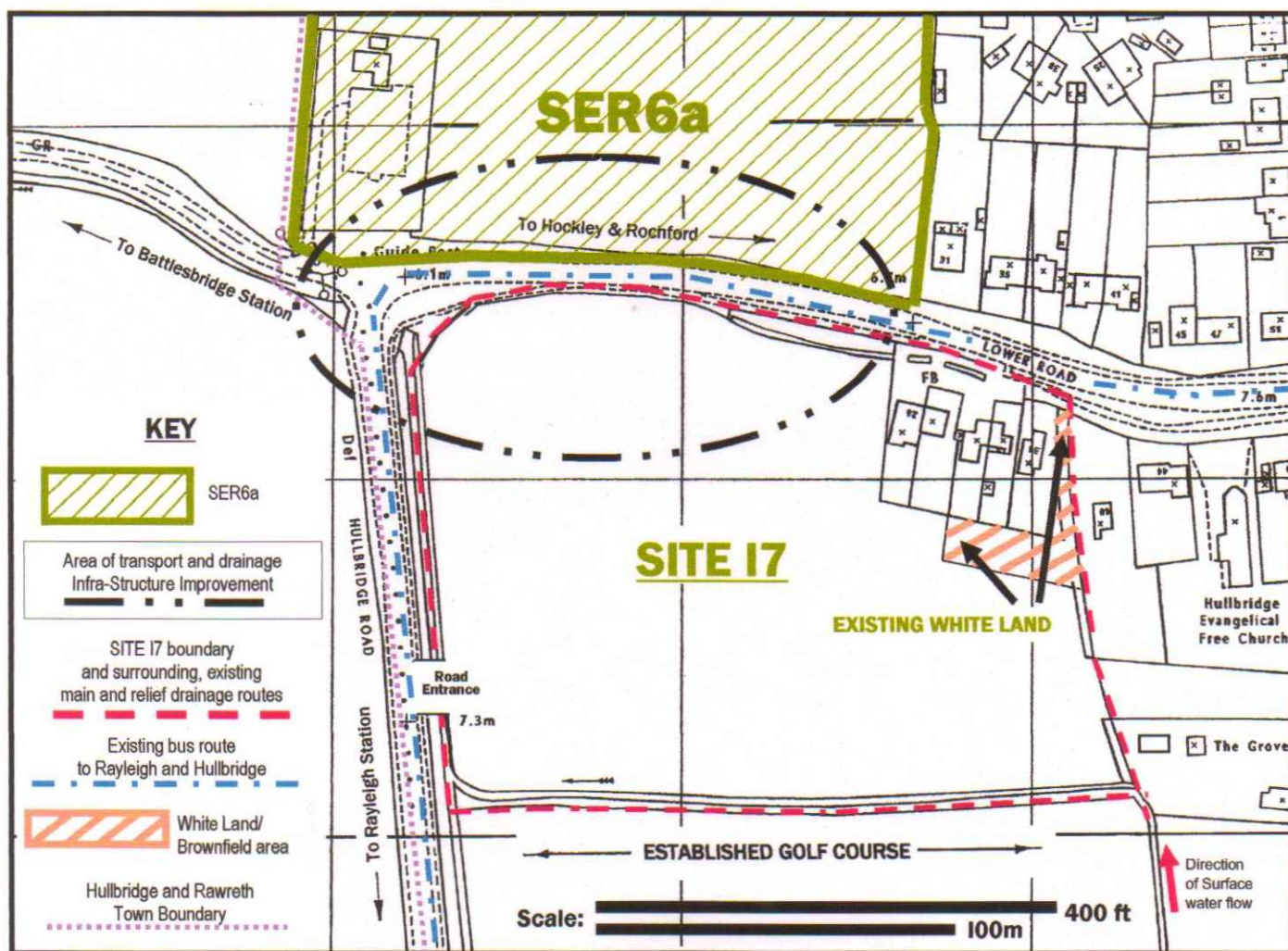


## **PLAN A**

The colour green shows the overall extent of SER6 with Site 17 added. The white dotted line delineates the Hullbridge Urban area to the east and shows to what extent SER6b as it stands, intrudes into the adjoining settlement of Rawreth to the west. The red line defines the division between SER6a and SER6b. SER6b is a less well defended area of greenbelt than Site 17.

For amenities comparison, please note the more favourable proximity of Site 17.





## **PLAN B and SITE 17 KEY DIAGRAM**

The strip of White Land shown in the north east corner of Site 17 fronting Lower Road with an attached area of White Land/Brownfield adjoining to the south, shows that part of Site 17 is already developed with housing. This makes the rest of Site 17 with its strong boundaries akin to an infill site.

It was one of the Rochford Council's planning tenets and now Government policy to use up such sites before releasing superior greenbelt countryside like some of the land in SER6b. Site 17 if released for housing could be party to any Section 106 Agreements and would lend support to the infra-structure changes necessary for this locality. The Hanover Land Trust and their partner Swan Housing hopes that the Examining Inspector together with Rochford Council Planners will appreciate the full community benefits of recommending that Site 17 should be included in Planning Policy SER6.





## **PLAN C**

**(Suggested infra-structure advantages by including Site17 in Policy SER6)**

In further support of including Site 17 within Policy SER6, as well as the expired planning consent notated above, the whole site was at one time granted a blanket planning consent for residential development, but only the five properties in the north east corner were completed due to the onset of WW2. When a definitive Road Traffic Study is conducted for the junction we suggest it would greatly facilitate and enhance the implementation of associated infra-structure by releasing Site 17 from the Green Belt.





## **PLAN D**

From the preceding statements and accompanying Plans A, B and C the above aerial view of South-West Hullbridge, shows how appropriate the inclusion or substitution of Site 17 as part of SER6 would be for the future development of this locality in relation to the necessary road junction improvements, surface water drainage and public transport.