

# Hullbridge Village Community Group (HVCG)

Telephone Number : 01702 232038

Email : [Thehullbridgevillagegroup@hotmail.co.uk](mailto:Thehullbridgevillagegroup@hotmail.co.uk)

98, Ferry road, Hullbridge, Essex. SS5 6EX

Chairman : Danny Gatehouse

Treasurer : Roy Forster

Secretary : Zoe Moore

Committee Member : Angelina Marriott

Committee Member : Janet white



Rochford District Council  
South Street  
Rochford  
Essex  
SS4 1BW

8<sup>th</sup> August 2013

For the attention of Kerry Freeman, Information Coordinator

Dear Sirs,

Examination of the Allocation Submissions Document ("ASD")  
prepared by Rochford District Council (the "Council")

We write to you further to the above process and, in particular, the initial officer comments on representations made by both ourselves and others in relation to policy SER6 (the "Policy"), which concerns future development in Hullbridge.

Our group is charged with developing a Village Plan for Hullbridge based upon the views of our residents. Although we are less than ten people, the views expressed in our representation letter (the "Submission")<sup>1</sup> were prepared with the benefit of the opinions expressed in a detailed questionnaire completed by up to 40% of the households in the village.

While we support much that has been submitted by other respondents, we have limited the content of this letter to the comments made by the Council that relate to our own submission (which are in the main dealt with on pages 259-265 of the ASD).

Background

1.1 The broad thrust of the Submission was as follows:

- the Policy was not legally compliant because there had not been the close consultation that the Council itself had said was necessary,
- it was not sound because it was contrary to both the Council's and government policy on community cohesion, and
- additionally, it was not sound because (i) the current infrastructure was unable to address existing traffic, flooding and waste problems in Hullbridge, (ii) further development would only exacerbate those deficiencies, and (iii) the necessary improvements to address the deficiencies could not be effectively implemented in time for the first date set out in the Policy for new development to commence.

1.2 To tackle these issues in a constructive manner, we proposed an amendment to the Policy that would have had the effect of deferring any development on the proposed site until 2021 at the earliest, unless the identified deficiencies had been addressed and a clear need for use of the site could be demonstrated. This would have had the dual benefits of (i) allaying the fears of residents and (ii) giving the authorities sufficient time to deal with these long-standing infrastructural issues.

---

<sup>1</sup> Dated 23<sup>rd</sup> January 2013, receipt of the Submission was acknowledged by the Council on 8<sup>th</sup> April 2013, under reference 32010.

## Legal compliance

- 2.1 If further evidence was needed that Hullbridge residents felt that consultation had been inadequate, we note that the consultation on the Policy appears to have elicited a greater response than for any other policy<sup>2</sup>, with the printed list of comments and responses covering some 53 pages<sup>3</sup>.
- 2.2 While it may be gratifying that we and others have now been able to make our case, the Council's response to its poor efforts at consultation<sup>4</sup> is weak; excusing its failure to seek the views of known community groups on the basis that (i) a single meeting had been held in the village (which was actually organised by a local councillor), (ii) a member of the Hullbridge Action Group submitted a personal representation and (iii) this group made its own representation anyway, is actually no excuse at all.

## Community cohesion

- 3.1 The Submission expressed concern that the Council had approached the proposed development in Hullbridge as a stand-alone development adjacent to the rest of the community, rather than as an integrated development sitting within the community as a whole. We acknowledge that this may have been a consequence of a strategy that a relatively small number of very large developments would have less impact on Green Belt than a large number of small ones.
- 3.2 Nevertheless, the officer's response<sup>5</sup> fails to address the issue. If new houses are to be built in Hullbridge, then community cohesion can only be enhanced if new residents are encouraged to feel part of the village by using existing facilities (which may well need to be enhanced and improved). Given that the area covered by the Policy is small compared to the residential part of Hullbridge, it would be better if anyone reading the Policy was left in no doubt about where "*open space, youth and community facilities*" should be focused.
- 3.3 There is one further issue to comment upon. We (as did the Parish Council) pointed out that part of the development land allocated in policy SER6 (b) would technically be in Rawreth. The Council is insistent that "*the proposed development will form part of the village of Hullbridge*"<sup>6</sup> (our emphasis added). We agree that this should be the case, but it is perhaps indicative that the consultation may have no constructive purpose if, even on trivial matters, the Council just insists it is right when it plainly is not.

## Roads

- 4.1 The concerns that we raised in the Submission can be summarised as follows:
- significant improvements are already well overdue (too much local and through traffic, only one bus service, no viable Sustrans, intermittent closures along Watery Lane),
  - the traffic flow problem would be worsened by proposed additional developments in

---

2 891, as per Table 2 on page 6.

3 Pages 213-265.

4 Page 259.

5 At the bottom of Page 258.

6 Page 154.

Hullbridge and in other areas close by,

- as such, limiting road improvements solely in the location covered by the Policy would be insufficient and ineffective,
- what is required to improve traffic flows is an integrated road traffic solution along Lower Road, Hullbridge Road and the entire length of Rawreth Lane (which we shall refer to in this letter as the "Corridor").

In response, the officer's comments can be set out as follows:

- *"public transport infrastructure improvements and service enhancements would be required to accompany development of this site"*<sup>7</sup>
- the Sustrans route is only *"an aspiration"*<sup>8</sup>, and
- despite the fact that the Highway Authority wishes to discourage the use of Watery Lane (because it is not part of the strategic highway network), the Council still believes that it is *"of local importance"* and that improvements are necessary there.<sup>9</sup>

- 4.2 To justify its position that a review that takes into account development along the Corridor as a whole is unnecessary, the Council says that a cumulative traffic impact assessment for development across the district has been carried out. Specifically, the officer's response<sup>10</sup> states

*"Essex County Council as the highways authority have been closely consulted throughout the process of the Core Strategy and the allocations DPD and as such have considered the cumulative, and individual, impact of the developments across District on the highway network. The consideration of potential sites has included views from the Highways Authority. This was done on an individual location and on a cumulative basis which assessed the impact of the cumulative development"*.

- 4.3 On 2<sup>nd</sup> June 2013, requests were made to both the Highway Authority and the Council<sup>11</sup>, referring to the above statement, and asking for *"copies of all documents after 1<sup>st</sup> January 2007 relating to any assessment of the impact of the cumulative development, whether or not they have been included in the final submission to the Planning Inspectorate"*. The responses are set out in Annexes 1 and 2 hereto.

- 4.4 The Highway Authority confirmed that it had undertaken Traffic Assessments for each development site on a standalone basis. However, in the course of its initial response and a secondary clarification (both of which are shown in Annexe 1), The Highway Authority indicated that any assessments were based solely upon proposed development where planning permission had already been granted (i.e., apparently, no assessment was made that took into account the new development contemplated in terms of the Policy).

Moreover, in the clarification response, it went on to make a statement, which we interpret as meaning that no cumulative analysis was undertaken to determine the impact of development along the Corridor as a whole; this statement reads,

*"It was the view of the Highway Authority that a transport model was not the appropriate tool for assessing impact in Rochford District. This is because of the dispersed distribution*

---

7 Page 233.

8 Page 258.

9 Page 155.

10 Pages 183, 218, 219 and 220.

11 In terms of the Freedom of Information Act 2000.

*and relatively low quantum of proposed development throughout the borough over the plan period to 2025. A strategic transport model would not accurately represent the changes on the local network. Therefore, the Highway Authority has focused on strategic development in the District; i.e., the Southend JAAP and the A127 corridor”.*

- 4.5 The Council's own disclosure reveals more. During preparation of the Core Strategy, there is a specific reference to the proposed development in Hullbridge in the minutes of a meeting in September 2008, where it was stated that

*“South West Hullbridge was seen as potentially having an impact on the highway network in terms of increased traffic on Watery Lane and the use of Rawreth Lane. Mitigation measures suggested for this location were to discourage the use of Beeches Road/Chelmsford Road [Watery Lane], promote highways improvements at Hullbridge Lane, Rawreth Lane and Beeches Road/Chelmsford Road and to promote public transport service enhancements”.*

Two other extracts from the minutes are relevant to the need to consider traffic flows along the Corridor as a whole. The first relates to a statement in respect of another development at a location known as “North of London Road” (a major development of well over 500 new homes along Rawreth Lane), which reads *“ECC noted that the Hullbridge Road/Rawreth Lane roundabout could be improved using additional land”*<sup>12</sup>. This information was later updated when it was revealed that *“There is a lack of capacity at the Hullbridge Road/Rawreth Lane junction as the utilities present in the adjacent field to the north makes improvements challenging. Contributions could be pooled from neighbouring developments to fund this improvement”*<sup>13</sup>.

- 4.6 We infer from this disclosure that:

- contrary to the Council's declaration, there is nothing to suggest that any assessment has been undertaken on the cumulative impact on Hullbridge arising from the other major developments Corridor, and
- nevertheless, the authorities have already acknowledged to each other that the Hullbridge and Rawreth Lane developments are likely to have a negative traffic flow impact on each other, and that pooled financial contributions may be required from all the developers in order to produce a complete solution to the overall problem.

That is, our call for an overall solution is in fact consistent with what the Council believes is necessary, even though this is not currently included in either the ASD or the Core Strategy.

### Facing up to the problems

- 5.1 In reviewing all of the officer's comments, what is evident is the different approaches taken by the Council and residents. The Council is required to go through a rather theoretical process to create a framework for community growth for the district as a whole over an extended period. Actually, residents are interested only in the real and practical consequences of what is set down in that framework, to the extent that they affect our own community.
- 5.2 We set out below three examples of the conflict between these two approaches.

---

<sup>12</sup> From a meeting on 22<sup>nd</sup> February 2012.

<sup>13</sup> From a meeting on 30<sup>th</sup> August 2012.

- The response to concerns about increased traffic flow from the east along Lower Road from the east for motorists wishing to use Watery Lane as a route to Chelmsford is that the Council “*seeks to discourage non-local traffic on local routes for non-local reasons*”<sup>14</sup>. While this may be a theoretical desire, the reality is that motorists will take what they consider to be the best route; i.e., residents of Ashingdon, Hockley and Rochford heading for Chelmsford are likely to use Lower Road and Watery Lane, whatever the Council may prefer.
- Other respondents have commented on the possible impact of new housing on local property values, and on the potential difficulty in new purchasers obtaining property insurance in areas with inadequate water and sewage drainage systems<sup>15</sup>. Again, while the Council's response is to say that “*these are not planning issues*” (which, of course, is correct), they do impact on deliverability. If these are real risks, then it will be more difficult to find buyers for properties on the policy site, and so developers will not be inclined to build.
- Questions raised about precisely what infrastructure improvements the Council believes may be necessary for this future development are deflected with the comment that “*the precise details will be determined at the planning application stage*”<sup>16</sup>. We believe that this is far too late. Local infrastructure upgrades will require significant financial contributions from developers, and the level of those contributions will be an important factor in determining whether or not a proposed development is feasible. Not addressing exactly what improvements are necessary until the planning application stage increases the risk that the Council will then find itself under pressure in any negotiations to give greater weight to the developer's profitability than to the needs of the community as a whole.

5.3 In the Submission, we developed powerful arguments to build a case that (i) the infrastructure problems in Hullbridge needed to be addressed before any new development took place, and (ii) this could not be done in any effective way before 2015, the earliest date when development could commence. In doing so, there are two important points that need to be taken on board:

- We are not discussing conceptual infrastructure issues that might arise if some new houses are built – we are talking about existing infrastructure problems that have blighted the village for years, and which will become more acute when additional houses are built.
- The community questionnaire demonstrated that there is real demand for additional housing in Hullbridge. However, in reality, Hullbridge is accessed by a single road so, from a practical viewpoint, exactly where any additional housing is located within Hullbridge is immaterial – wherever it is located, it must add very substantially to traffic flows and to the strain on water and drainage systems.

## Drainage and sewage

6.1 Much of this letter focuses on traffic flow issues because of the later disclosure that is

---

<sup>14</sup> e.g., page 223.

<sup>15</sup> E.g., page 251

<sup>16</sup> E.g., page 219

referred to above. However, a number of people made submissions during the consultation about drainage and sewage issues. We do not wish to add much to what was set out in the Submission, beyond saying that the same issues that are raised in section 5 of this letter apply equally to this matter. These are major infrastructural problems that are faced by both the proposed developments in Hullbridge and in Rawreth Lane.

- 6.2 However, it must be said that, while the Council has indicated that “*proposed development in Rayleigh and Hullbridge have not been considered in isolation*”<sup>17</sup>, similar statements in respect of traffic flows unfortunately do not appear to match later evidence. As set out in the Submission, Anglian Water appears to take a reactive role in the process, even though the Council has made it clear that it is Anglian Water that is responsible for ensuring that the wastewater and sewage systems are sufficient<sup>18</sup>. We believe that Anglian Water should be ahead of the curve, not behind it.

### Our proposal

- 7.1 In the Submission, we proposed that the Policy should be amended to restrict any development before 2021, subject to certain releases added to provide the Council with necessary flexibility. The Council's response to this proposal is simply to say that it is inconsistent with the Core Strategy, albeit that there is a suggestion that “*an early review of Core Strategy is expected to take place later in the year*”<sup>19</sup>.
- 7.2 To our mind, then, the Council has raised no substantive objection to the proposed wording, which we believe has a number of significant advantages:
- it restricts substantial additional development from being undertaken while these issues remain unaddressed (wherever in Hullbridge it goes),
  - as it is, The Council now believes that hidden in a response on page 262 is the fact that “*the first dwellings are expected to be built on site in 2019/2020*”<sup>20</sup>, or only a year or so before we are ourselves proposing,
  - in the meantime, it allows all the relevant parties (the Council, the Highway Authority, central government, both Hullbridge and Rawreth Parish Councils, local community groups etc.) sufficient time to work together to agree on – and implement - what infrastructural changes they decide are required, and
  - overall, in the period up until 2021, our proposal would create a general presumption against development (consistent with its current status as Green Belt land), while maintaining the Council's flexibility to amend that status and press ahead with development if it can be demonstrated that it is really necessary, and that the infrastructure can accommodate it.

### Conclusion

- 8.1 As part of the examination of the ASD, the Inspector is required to consider its soundness, and this in turn involves determining whether the Council's proposals are deliverable. That is, the Inspector is testing the broadly theoretical development framework against the realistic prospect that the Council's policies can be implemented within the timescales set

---

<sup>17</sup> Page 225.

<sup>18</sup> e.g., page 225.

<sup>19</sup> Page 265.

<sup>20</sup> Page 262.



out in it.

- 8.2 To address the objections that we raised in the Submission, we proposed that development should be deferred until such time as clearly identified infrastructural problems were addressed, which we thought could be achieved by 2021 if all interested parties worked together to achieve it.

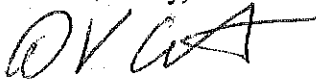
None of the Council's responses has led us to withdraw our objections or amend our proposal in any way.

- 8.3 What may not be fully appreciated is that residents (who, on average, have lived in Hullbridge for decades) love their village the way it is, appreciate the special sense of community that they believe exists there. While they acknowledge that additional housing is required - and will be built - in the future, they wish to ensure that the village is able to cope with the consequences of it.

These matters weigh heavily on residents, not helped by the sense that the council has a broader agenda in which the views of Hullbridge residents carry little or no weight. If the Council truly believes that no building will take place until 2019/2020, then it has nothing to lose by (i) accepting the proposed amendments to the Policy, and (ii) putting in the time and effort to ensure that the infrastructural improvements to protect Hullbridge are put in place. This would come as a very important and welcome relief to its residents.

We trust that the contents of this letter are clear, and we look forward to learning how you intend to respond to both our comments and those of other Hullbridge residents at the hearings in September.

Yours faithfully,



Mr. D.V. Gatehouse

Chairman

Hullbridge Village Community Group.



## Freedom of Information request

ANNEXE 1

From

Sent: 02 June 2013 17:51:07

To: Essex FOI (yourrighttoknow@essex.gov.uk)

Dear Sirs,

This is a request made under the Freedom of Information Act.

In the Consultation Statement included in the Allocations Submission Document submitted by Rochford District Council to the Planning Inspectorate in April 2013, in relation to a number of statements received regarding the seeming lack of a cohesive transport assessment made across all anticipated developments in the district (for example, on pages 219 and 220), the Initial Officer's comment was,

*"Essex County Council as the highways authority have been closely consulted throughout the process of the Core Strategy and the Allocations DPD and as such have considered the cumulative, and individual, impact of the developments across the District on the highway network. The consideration of potential sites has included views from the Highways Authority. This was done on an individual location basis and on a cumulative basis which assessed the impact of the cumulative development".*

Please provide copies of all documents after 1<sup>st</sup> January 2007 relating to any assessment of the impact of the cumulative development in Rochford District that were provided to Rochford District Council or its advisors.

In the first instance, they may be sent to me by e-mail.

Thank you for your co-operation in this matter.

Yours faithfully,

## Freedom of Information Act / Environmental Information Regulations Request

Reference: ECC-033847-13

Response: 17 June 2013

In the Consultation Statement included in the Allocations Submission Document submitted by Rochford District Council to the Planning Inspectorate in April 2013, in relation to a number of statements received regarding the seeming lack of a cohesive transport assessment made across all anticipated developments in the district (for example, on pages 219 and 220), the Initial Officer's comment was,

*"Essex County Council as the highways authority have been closely consulted throughout the process of the Core Strategy and the Allocations DPD and as such have considered the cumulative, and individual, impact of the developments across the District on the highway network. The consideration of potential sites has included views from the Highways Authority. This was done on an individual location basis and on a cumulative basis which assessed the impact of the cumulative development".*

Please provide copies of all documents after 1st January 2007 relating to any assessment of the impact of the cumulative development in Rochford District that were provided to Rochford District Council or its advisors.

The cumulative impact of developments in Rochford District has been considered through a number of mechanisms. This generally consists of:

- Transport Assessments per development site
- London Southend Airport and its environs Highway network model developed in conjunction with Southend Borough Council and Rochford District Council
- Traffic flows and Accident history data
- Development Management Policies

The Transport Assessments take into consideration cumulative impact through the inclusion of committed development flows (sites with planning permissions) and the inclusion of growth figures. The National Trip End Model (NTEM) forecasts and the TEMPro (Trip End Model Presentation Program) software are used for these purposes. The forecasts include population, employment, households by car ownership, trip ends and simple traffic growth factors based on data from the National Transport Model (NTM).

All of the information related to Transport assessments in recent years can be located on the Rochford District Council website planning portal using the following link and enter application details set out below:

<http://maps.rochford.gov.uk/DevelopmentControl.aspx?RequestType=ParseTemplate&Template=DevelopmentControlSearch.tmplt>

2013  
JUN 17 11:01  
ECC-033847-13

Land between Main Road and Rectory Road, Hawkwell	12/00381/FUL
190 London Road, Rayleigh	12/00363/FUL
Pond Chase Nursery, Folly Lane, Hockley	12/00283/OUT
Elizabeth Fitzroy Homes, London Road, Rayleigh	12/00279/FUL
Star Lane brickworks, Great Wakering	12/00252/FUL
London Southend Airport, Rochford	12/00103/FUL
Land south of Coombes Farm, Stambridge Road, Rochford	11/00781/OUT
Brays Lane	11/00315/OUT
North of Hall Road	10/00234/OUT

All the information relating to the modelling for the London Southend Airport joint Area Action Plan can be located by using the following link.

[http://www.southend.gov.uk/downloads/download/242/london\\_southend\\_airport\\_joint\\_area\\_action\\_plan](http://www.southend.gov.uk/downloads/download/242/london_southend_airport_joint_area_action_plan)

#### **Your Right to Know**

Information Services

Essex County Council

Telephone: 08457 430430

Email: [YourRightToKnow@essex.gov.uk](mailto:YourRightToKnow@essex.gov.uk) | [www.essex.gov.uk](http://www.essex.gov.uk)

---

From:

To: yourright.toknow@essex.gov.uk

Subject: RE: Freedom of Information request - FAO Mark Railing

Date: Mon, 17 Jun 2013 15:37:14 +0100

Dear Mark,

Thank you for your response.

However, if I understand what you have provided, ECC's only cumulative analysis relates to those developments for which planning permission has been granted, although you do make allowances for the natural growth in traffic that would arise through population and employment changes, etc.

If you will excuse me for saying so, that seems to suggest that no cumulative analysis is done (or has, in this case, been done) on the impact on traffic flows from possible additional housing on the specific sites that the Council has proposed should be permitted within its Core Strategy.

Please can you confirm that this is the case (if you can understand my explanation), else explain why I have misunderstood what has been sent to me.

Many thanks for your assistance to date, and I look forward to your reply as soon as possible.

Kind regards,

Essex County Council  
PO Box 11,  
County Hall,  
Chelmsford,  
Essex CM1 1QH

Our Ref: ECC-033717-13  
Date: 04 July 2013

Dear

Thank you for your further comments in relation to your request for information.

Please accept my apologies for the delay in responding to your e-mail below; I have received the following in response to your question from the engineer who provided the original response.

It was the view of the Highway Authority that a transport model was not the appropriate tool for assessing impact in Rochford District. This is because of the dispersed distribution and relatively low quantum of proposed development throughout the borough over the plan period until 2025. A strategic transport model would not accurately represent the changes on the local network. Therefore the Highway Authority has focused on strategic development in the District i.e. the Southend Airport JAAP and the A127 corridor.

To clarify the other point the Transport Assessments in addition to modelling the proposed and committed developments also use a national traffic forecasting tool which considers a number of factors including:

- Population growth using ONS 2008-based projections
- Dwellings - updated using local authority annual monitoring reports
- Employment forecasts - updated consistent with more recent GDP forecasts from the Office of Budget Responsibility
- Distribution of employment and workers by region using workforce jobs and the labour force survey
- Car purchasing cost index in the Car Ownership Model in line with more recent RPI data

All of these factors ensure that a holistic approach is considered and accounted for in transport modelling.

I trust that this information satisfies your request. However, should you require anything further, please contact me and I will endeavour to assist you further.

If you are not satisfied with my response to your request, please let me know. If I am unable to resolve the issue immediately, I will explain our complaints procedure.

If, after following our complaints procedure, you are still not satisfied, you are entitled to ask the Information Commissioner to review our decision. You can contact the Information Commissioner at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF; Telephone 0303 123 1113.

---

Yours sincerely,

Mark Ralling

**Your Right to Know**

Information Services

Essex County Council

Telephone: 08457 430430

E-mail: [YourRightToKnow@essex.gov.uk](mailto:YourRightToKnow@essex.gov.uk)



ANNEXE 2

## Freedom of Information request

From: .

Sent: 02 June 2013 17:46:06

To: customer.care@rochford.gov.uk (customer.care@rochford.gov.uk)

Dear Sirs,

This is a request made under the Freedom of Information Act.

In the Consultation Statement included in the Allocations Submission Document submitted to the Planning Inspectorate in April 2013, in relation to a number of statements received regarding the seeming lack of a cohesive transport assessment made across all anticipated developments in the district (for example, on pages 219 and 220) , the Initial Officer's comment was,

*"Essex County Council as the highways authority have been closely consulted throughout the process of the Core Strategy and the Allocations DPD and as such have considered the cumulative, and individual, impact of the developments across the District on the highway network. The consideration of potential sites has included views from the Highways Authority. This was done on an individual location basis and on a cumulative basis which assessed the impact of the cumulative development".*

Please provide copies of all documents after 1<sup>st</sup> January 2007 relating to any assessment of the impact of the cumulative development, whether or not they have been included in the final submission to the Planning Inspectorate.

In the first instance, they may be sent to me by e-mail.

Thank you for your co-operation in this matter.

Yours faithfully,

**From:** Kerry Freeman  
**Sent:** 28 June 2013 11:56  
**To:**  
**Subject:** FOI request

28<sup>th</sup> June 2013

Dear

Thank you for your request for information which has been dealt with under the Freedom of Information Act 2000.

Information relating to the potential impact of proposals on the highway network (both on an individual location and cumulative basis) was considered during the examination of the Core Strategy, which was adopted on 13 December 2011. Two documents were produced during the examination which provide a record of correspondence between Essex County Council highways and the Council, and set out how transport has been approached within the Core Strategy. These documents are available on the Council's website at the following links:

Record of Correspondence between RDC and ECC vis-à-vis Transport Infrastructure and the Rochford District Core Strategy ([http://fs-drupal-rochford.s3.amazonaws.com/pdf/corestrat\\_add\\_corr.pdf](http://fs-drupal-rochford.s3.amazonaws.com/pdf/corestrat_add_corr.pdf))

Rochford District Core Strategy Approach to Transport within Local Development Framework by Rochford District Council and Essex County Council ([http://fs-drupal-rochford.s3.amazonaws.com/pdf/corestrat\\_add\\_appr.pdf](http://fs-drupal-rochford.s3.amazonaws.com/pdf/corestrat_add_appr.pdf))

Meeting notes between the Council and Essex County Council highways as part of the preparation of the Allocations Document have also been published and form part of the evidence base for the plan. These documents are notes from the discussions between Essex County Council highways and the Council in relation to the potential site options within each of the Core Strategy general locations and are available on the Council's website at the following links:

Notes of Meeting with Highway and Public Transport Representatives at Essex County Council (22 February 2012)  
([http://www.rochford.gov.uk/sites/rochford.gov.uk/files/documents/files/planning\\_evi\\_base\\_highwaymeetingfeb.pdf](http://www.rochford.gov.uk/sites/rochford.gov.uk/files/documents/files/planning_evi_base_highwaymeetingfeb.pdf))

Rochford District Transportation and Highway Meeting (30 August 2012)  
([http://www.rochford.gov.uk/sites/rochford.gov.uk/files/documents/files/planning\\_evi\\_base\\_highwaymeetingaug.pdf](http://www.rochford.gov.uk/sites/rochford.gov.uk/files/documents/files/planning_evi_base_highwaymeetingaug.pdf))

I trust that you find the attached useful, but if you are unhappy with the way in which your request for information has been dealt with you can request a review by writing to: The Head of Information and Customer Services, Rochford District Council, South Street, Rochford SS4 1BW or alternatively by email to [customer.care@rochford.gov.uk](mailto:customer.care@rochford.gov.uk).

---

If you remain dissatisfied with the handling of your request or complaint, then you have a right to appeal to the Information Commissioner at: The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF. [www.ico.gov.uk](http://www.ico.gov.uk).

There is no charge for making an appeal.

Kind regards

Kerry Freeman  
Information Coordinator  
Information and Support Services  
Rochford District Council

**Rochford District Core Strategy  
Approach to Transport within Local Development Framework  
by Rochford District Council and Essex County Council**

Rochford District Council (RDC) has worked closely with Essex County Council (ECC) throughout the process of producing the Rochford District Core Strategy. Essex County Council is the local highway authority. The two authorities are satisfied that the submitted Core Strategy addresses the strategic transport issues within the District by setting out an adequate policy context for the future development requirements and transport needs of Rochford District. The two authorities are also liaising on production of the other policy documents that will form part of the Local Development Framework. This note briefly reviews the production of the Rochford Local Development Framework in terms of the overall approach to transport; the proposed development locations of the Core Strategy; and the other Development Planning Documents and Supplementary Planning Documents.

**Overall Approach to Transport**

The Core Strategy sets out an overall approach to Transport in 'Chapter 10: Transport' through a Vision and Objectives for Transport which are supported by the proposed 8 policies for Transport. These 8 policies cover a range of appropriate and sustainable transport measures in support of, and directly related to, the Spatial Vision and the future development strategy for Rochford District.

The emphasis of the overall approach to Transport is to set the strategic context for emergence of a package of practical measures to enable use of alternative means of travel and to reduce dependence on use of the private car, whilst acknowledging that some complementary highway improvements continue to be required. Specifically the policies are designed to enable,

- reduced reliance on the private car and mitigation of development impacts whilst sustaining access to employment locations and managing congestion – Policy T1 (Highways);
- prioritisation of highway improvements to address specific issues on identified road links – Policy T2 (Highways Improvements);
- extended and improved passenger transport links for existing and proposed development areas – Policy T3 (Public Transport) and Policy T4 (South Essex Rapid Transit (SERT));
- consideration of alternative and sustainable means of transport alongside new development proposals and for existing establishments – Policy T5 (Travel Plans);
- a network of cycle and pedestrian routes – Policy T6 (Cycling and Walking) – that are also linked to leisure opportunities – Policy T7 (Greenways);
- parking standards that maintain residential amenity and recognise the access and safety requirements for specific types of user and vehicle

without encouraging excessive car trips to facilities and services – Policy T8 (Parking Standards).

The overall approach to Transport of the Core Strategy aligns with the current operative Local Transport Plan (LTP) for Essex (Examination Core Document 22.C12). Particularly relevant are,

- the LTP Policy Framework which identifies the strength of the relationship between each LTP objective and the 6 identified policy intervention themes (pages 116 and 117);
- the LTP Policy Toolbox which identifies the mixture of initiatives and types of interventions that make up the broad packages and their relationship with the LTP's objectives (pages 117 and 118);
- the linking of the LTP objectives to Essex County Council's supporting policy documents (page 119).

The Essex Local Transport Plan is currently being reviewed, with the Review Plan becoming operative from April 2011. The Review is being undertaken by Essex County Council in consultation with key stakeholders, including Rochford District Council. This process is maintaining the alignment between the approach and content of the submitted Core Strategy and the emerging LTP.

Both the Core Strategy and the LTP will be supported by other policy and guidance documents. The County Council has a range of policy documents as referenced on page 119 of the LTP. Of particular relevance to the Rochford Core Strategy are,

- Essex County Council documents, produced in association with the Essex Planning Officers Association, that present guidance on Parking Standards, Highways and Transport Development Management and Developer Contributions for ECC Infrastructure Requirements;
- the District Council LDF documents on Development Management DPD, Parking Standards SPD and Transport SPD.

### **Proposed Development Locations of Core Strategy**

The proposed development locations of the Core Strategy present opportunities to introduce measures in accordance with Policies T1 to T8 of the Core Strategy. Specifically, measures which would be in accordance with the principles of reducing the need to travel; encouraging use of sustainable means of travel; and linking development to passenger transport.

Each of the locations identified for development in the Core Strategy has been assessed against Essex County Council's Highways and Transportation Development Control Policies. The County Council is satisfied that impacts on the highway and transport network can be mitigated through technically feasible measures that may be funded through developer contributions without adversely affecting the viability of the proposed development. The measures would include localised highway improvements and improvements

to the passenger transport, walking and cycling networks. Topic Paper 1: Indicative Core Strategy Infrastructure Costs (Examination Core Document SUBDOC3) sets out the currently anticipated costs and funding arrangements.

### **Development Planning Documents and Supplementary Planning Documents**

Rochford District Council and Essex County Council continue to liaise on the range of Development Planning Documents (DPD) and Supplementary Planning Documents (SPD) which will support the Core Strategy. Essex County Council is specifically assisting the District Council on the transport aspects of the following Documents,

- o Allocations DPD
- o Development Management DPD
- o Rayleigh Town Centre Area Action Plan
- o Rochford Town Centre Area Action Plan
- o Hockley Town Centre Area Action Plan
- o Transportation Strategy SPD

In addition, the County Council is contributing to the production of the London Southend Airport and Environs Joint Area Action Plan, which is being jointly produced by Rochford DC and Southend-on-Sea BC. The technical aspects of the Plan are subject to a consultancy study, for which Essex County Council contributes to the Steering Group. It should be noted that Essex County Council was a signatory to the Section 106 agreement accompanying the recent planning permission for extension of the runway at the Airport.

In its role as Local Highway Authority, Essex County Council is instrumental in producing, in association with the Essex Planning Officers Association, a number of policy and guidance documents. The purpose of these documents is to set out the Highway Authority's approach to assessment of development proposals. They include,

- o Parking Standards: Design and Good Practice
- o Highways and Transportation Development Control Policies
- o Developers' Guide to Infrastructure Contributions

The Highways and Transportation Development Control Policies are appended to the adopted Local Transport Strategy. The other two documents listed above have been subject to recent review, including public consultation and Sustainability Appraisal and Strategic Environmental Assessment and the Essex Planning Officers Association has commended them as suitable for adoption as SPDs or incorporation within SPDs.

The County Council has also published Transport Assessment Guidelines to support the Development Management process for applicants and authorities.

## **Record of Correspondence between RDC and ECC vis-à-vis Transport Infrastructure and the Rochford District Core Strategy**

Officers from Rochford District Council (RDC) discussed issues pertaining to infrastructure provision, and the impacts of future development on this, regularly with colleagues at Essex County Council (ECC) throughout the development of the Core Strategy. This paper sets out the record of key discussions relevant to the issue of transport infrastructure provision and the Rochford District Core Strategy. Beyond these discussions, specific queries and points of clarification were pursued by each authority as they arose. This paper does not detail correspondence between RDC and ECC in relation to Sustainability Appraisal work undertaken by the latter on behalf of the former, as this was done by a team independent from the rest of ECC, or to issues of other infrastructure provision.

### **October 2007**

In October 2007, ECC and RDC agreed to meet regularly to discuss the Core Strategy as it developed through its various stages.

### **November 2007**

On 13<sup>th</sup> November 2007 RDC Officers met with ECC to discuss current trends with regards to highway usage in the District, to inquire as to what studies ECC would be undertaking in the future, and to discuss possible implications of new development on highway network.

### **September 2008**

Discussions took place on potential highway infrastructure issues in relation to proposed locations during September 2008, and ECC contacted RDC on 26<sup>th</sup> September 2008 giving comments from a highways perspective on several suggested locations for housing within the District.

West Hockley was seen as having no significant issues for a relatively small quantum of development and it was recommended that local junction/access improvements should be sought. West Rochford was also considered to be viable due to highway access and reduced impact on Ashingdon Road. The location would direct strategic traffic onto strategic routes, and minimise non localised traffic on localised routes. It was recommended that sustainable links be provided from the location to Rochford town centre, and there was a potential to enhance existing public transport due to the size of development suggested.

Great Wakering is also unlikely to see negative impacts from a highways perspective, although it was noted that the location is adjacent/close to the Southend Borough Council boundary.

Canewdon (South) was again considered to have no significant impacts on the highway network, although the cumulative impacts may need further consideration.

Locations that presented issues were North of London Road, with access from the A1245 considered a potential issue, alongside public transport penetration to the location. Mitigation measures were suggested in the form of junction improvements at Chelmsford Road and London Road, alongside public transport infrastructure improvements, a new public transport service, and walking and cycling integration measures to the town centre. In discussions, it was also noted that this development location had the potential to engender transport improvements by providing a link between Rawreth Land and London Road.

South West Rayleigh was seen as having a negative impact on Rayleigh Weir, and mitigation measures for this would include local junction and access improvements alongside contributions to the ECC Route Management Strategy proposals for the Rayleigh Weir junction. Discussions with ECC established that a new highway access to the A127 or A1245 would be unfeasible.

South Hawkwell was seen as having a potential impact on the Rectory Road/Hall Road junction and mitigation measures suggested for this were potential capacity improvements to the existing mini roundabout. This location would direct strategic traffic onto strategic routes, and minimise non localised traffic on localised routes.

Ashingdon (north of King Edmund School) was seen as potentially having a highways impact in terms of pinch points within the town centre, and the junction of Brays Land and Ashingdon Road. It was stated that this location should be treated in partnership with South East Ashingdon in terms of cumulative impact. Suggested mitigation measures include using CIL to help improve highway capacity to Rochford Town Centre.

South West Hullbridge was seen as potentially having an impact on the highway network in terms of increased traffic on Watery Lane, and the use of Rawreth Lane. Mitigation measures suggested for this location were to discourage the use of Beeches Road/Chelmsford Road, promote highways improvements at Hullbridge Lane, Rawreth Lane and Beeches Road/Chelmsford Road and to promote public transport service enhancements.



## **April 2009**

A meeting was held between RDC and ECC on the 24<sup>th</sup> April 2009 to discuss the potential amendments to housing locations as outlined in the Core Strategy Revised Preferred Options.

It was confirmed at the meeting that as a result of the Strategic Housing Land Availability Assessment more housing land was being identified than originally seen in the Urban Capacity Study. Consequently the housing locations and quantum in the Core strategy were being reassessed accordingly.

The various location and housing numbers were discussed and ECC gave their view as discussed below, however the discussion was limited until such time as the housing locations and numbers had been finalised.

Concern was noted in relation to the impact of development in East Rochford on Rochford Town Centre.

RDC were asked to confirm final housing locations and quantum, and also to inform ECC of the publication date of the SHLAA. It was suggested that there was potential for RDC to produce a transportation strategy alongside the Core Strategy.

## **July 2009**

A meeting then took place on the 29<sup>th</sup> July 2009 between RDC and ECC. At this juncture the Core Strategy Submission Document had been recommended for approval by the LDF Sub Committee and was due to be presented to full Council on 9<sup>th</sup> September 2009.

Highways stated that there was no issue in terms of the locations East of Ashingdon and 100 dwellings.

The Infrastructure Charging Schedule was then discussed with RDC confirming that Charging Zones are being considered based on settlements. It was also confirmed that RDC will be producing an Infrastructure Charging Schedule which will be subject to EIP.

It was stated that there was time for Highways to consider the infrastructure requirements put forward in the Submission Document, and to let RDC have comments prior to the Full Council Meeting. ECC agreed to review this and provide indicative costings.

An alternative location to the East of Rochford was then discussed in terms of a potential planning application and conformity to and impact on the Core Strategy. RDC stated that they do not support this, as traffic will be directed through a borderline AQMA. ECC were not as negative although noted they had previously raised concerns to the East of Rochford as a potential location.

---

RDC confirmed that a Transportation Strategy will be produced, and ECC commented that it is necessary to distinguish whether this will be addressing future development or current issues.

#### **January 2010**

Correspondence was sent to ECC on 6<sup>th</sup> January 2010, with the draft Topic Paper on strategic infrastructure costs in order to get feedback and buy in from ECC. Comments were received on this in relation to wording and clarification on figures shown. Figures for highway costs were inserted into the draft Topic Paper by ECC, which were agreed by RDC and published in the final version of the Topic Paper.

#### **April 2010**

RDC and ECC agree on a joint position statement with regards to highway infrastructure provision and the Core Strategy. Please see Appendix 1.

**Notes of Meeting with Highway and Public Transport Representatives at  
Essex County Council (ECC)  
22<sup>nd</sup> February 2012**

**Attendees:**

Roy Lewis (ECC)  
Mark Lawrence (ECC)  
Katherine Wilkinson (ECC)  
Richard Gravatt (ECC)  
Samuel Hollingworth (RDC)  
Natalie Hayward (RDC)

**Residential Site Allocations**

**North of London Road**

ECC advised that for a development of 550 homes two access points would be needed to serve it.

The potential for a bus route between Rawreth Lane and London Road and options to discourage car usage was discussed. It was discussed whether an existing route could be diverted.

It was noted that carriageway widths would not need to be stated within concept statements.

ECC advised that there are no issues with the A1245/London Road roundabout. ECC noted that the Hullbridge Road/Rawreth Lane roundabout could be improved using additional land. ECC highlighted potential issues around the railway station.

ECC advised that additional crossing facilities and well planned walking and cycling routes would be needed to discourage short car journeys.

**West Hockley**

Potential access onto Folly Lane and Church Road was discussed. The issues of frontage onto Church Road and visibility would need to be considered.

Potential access onto Chevening Gardens was discussed.

ECC noted that there are pros and cons to both.

**South Hawkwell**

Thorpe Road, in terms of proposals within the planning application, was discussed e.g. minimal upgrades. Junction improvements were also discussed.

**South East Ashingdon**

The local highway network was discussed. ECC highlighted the importance of travel plans, and the need to encourage walking and cycling.

ECC advised that for a development of 500 homes two access points would be needed to serve it.

#### **South West Hullbridge**

ECC advised that traffic should not be encouraged along Watery Lane.

Junction alterations were briefly discussed.

It was suggested that a new junction could be created along Lower Road, and access could be provided along Malyons Lane. Other routes would be pedestrian. There shouldn't be any roads westwards of the allocated site.

#### **West Great Wakering**

ECC highlighted that access to secondary schools would need to be considered. It was noted that bus access along the High Street is preferable.

No highway issues were identified.

There may be potential to link to the brickworks site with a site to the south of the High Street.

#### **South Canewdon**

No highway issues were identified.

#### **Employment Site Allocations**

##### **Rayleigh**

Potential access issues for Michelin Farm were identified – at the Fairglens Interchange and the railway bridge to the north.

There is potential for a bigger employment site to the south of London Road.

##### **Great Wakering**

No highway issues were identified.

#### **Gypsy and Traveller Site Allocations**

##### **East of A1245**

No technical argument against the site, even with additional pitches. It was noted that there is a signalised junction to the north and access is onto a dual carriageway.

##### **South of London Road**

The pylons were noted as an issue.

## **Rochford District Transportation and Highway Meeting**

Thursday 30<sup>th</sup> August 2012 – 10am

County Hall, Chelmsford

### **Agenda**

1. LDF Update
2. Discussion of transport requirements / highway improvements for potential sites (residential & employment). Including potential costs:

North of London Road, Rayleigh

- links between residential and new employment along London Road
- potential options for a bus-only route
- links with Rawreth Industrial Estate

West Rochford

West Hockley

- Folly Lane and Church Road potential access

South Hawkwell

East Ashingdon

South West Hullbridge

South Canewdon

South East Ashingdon

West Great Wakering

- potential links to the High Street and Star Lane
- links between residential and new employment along Star lane
- links between brownfield and greenfield potential residential options

3. Hockley, Rayleigh and Rochford Area Action Plans
4. Transportation SPD
5. AOB

## **Notes**

### **Attendees**

Katherine Wilkinson (ECC)  
Mark Lawrence (ECC)  
Tony Buston (ECC)  
Sam Hollingworth (RDC)  
Natalie Hayward (RDC)

### **Rayleigh**

- Access onto the site would be considered as part of a planning application (rather than through a CIL contribution)
- A roundabout or signalised junction would be required
- Improvements to the roundabout at the western end of London Road could be addressed through CIL but this would be subject to the CIL tests
- In general ECC will investigate the potential for 'stats data searches' for the locations. RDC will investigate potential funding
- A bus only route could be provided (using bus gates; cameras; tank traps etc). It is important to retain a dialogue with relevant bus companies (First or Arriva).
- Instead of two access points to the north and south, one access point to the north could be provided, and one to the south. The site could be linked into a smaller adjacent development which has access onto London Road and provide a circular link, one strategic access point and one smaller access point onto London Road. A bus only route could still be provided. A signalised junction would increase costs
- There is a lack of capacity at the Hullbridge Road/Rawreth Lane junction as the utilities present in the adjacent field to the north makes improvements challenging. Contributions could be pooled from neighbouring developments to fund this improvement
- In relation to employment land to the south of London Road, ECC requested that RDC calculate the approximate number of jobs likely to be generated from new employment sites

### **Michelins Farm**

- ECC discussed the issues with developing compliant junctions and stated that it could be engineered but this would likely be costly and could impact on viability

### **Rochford**

- Cycling links both along Ironwell Lane and Hall Road and through the site (connecting Hall Road to Ironwell Lane). This site should link to the Sustrans route.

- ECC advised that the Sutton Road/Anne Boleyn junctions have been looked at the planning application stage

#### **Hockley**

- Existing access on and off the site is acceptable provided it meets the required standards
- No new point of access should be provided if the site to the west is included; the existing link to the south onto Church Road should be utilised
- There is an existing public footpath to the south connecting to Hockley Road and there is a frequent bus service along here

#### **Hawkwell**

- There are no issues with residential development on Thorpe Road Industrial Estate
- Thorpe Road will only be improved in the application area to deter people going south
- Contributions towards cycling along Ironwell Lane (potential off road route) would be required and this site should link to the Sustrans route.
- Potential for on road alternative cycling route along Hall Road

#### **Ashingdon**

- The south east site should have at least two access points primarily onto Ashingdon Road, possibly three
- A modal shift should be emphasised – pedestrian and cycling links, improvements to public transport

#### **Hullbridge**

- Potentially one access point to the south and one to the east. Elsewhere pedestrian links to the east.
- Contributions towards public transport and cycling required. This site should link to the Sustrans route.

#### **Canewdon**

- Noted farm traffic uses the road leading to the church
- One access from site to the west wouldn't be an issue

#### **Great Wakering**

- Depending on numbers, the site to the north could have one access point

---

- Links to cycle network to be considered, potentially in conjunction with Southend

- Station travel planning and access to the nearest station would be required (applicable to all sites)

#### **HAAP**

- ECC comments on previous stages of the HAAP are still applicable

#### **RayAAP/RocAAP**

- Transport issues to be discussed later in the year.

#### **Transport SPD**

Rochford stated their intention to develop a Transport SPD. ECC agreed to support them in this.