

Hullbridge Village Community Group (HVCG)

Tel: [REDACTED] Email: [REDACTED]

Rochford District Council
South Street
Rochford
Essex
SS4 1BW

23rd January, 2013

Dear Sirs,

This letter sets out our representations in respect of the Allocation Submissions Document (the "ASD") issued by Rochford District Council (the "Council"), and is submitted as part of the consultation on it.

In relation to the policy affecting residential development in Hullbridge (Policy SER6), we believe that the ASD is neither legally compliant nor sound, for the reasons set out below.

Some arguments have needed to be set out in some detail, but that is only to ensure that they receive proper attention when it is examined. Nevertheless, in order to allow a rapid review of the important points that we wish to make, we have set them out at the top of each section, with further supporting explanations underneath. This should allow our representations to be considered in as succinct a manner as possible.

1 Executive summary

1.1 We do not believe that Policy SER6 of the ASD is legally compliant because

- (i) it has been prepared without the proper consultation with local groups as was set out in the Statement of Community Involvement,
- (ii) in particular, the Council has failed to carry out the extensive consultation in respect of Hullbridge, as was later set out in the Core Strategy document.

1.2 We do not believe that Policy SER6 of the ASD is sound because the policy as set out is inconsistent with the aim of community cohesion, which the Council admits is particularly important in our village. We say this because the policy is written in terms of a standalone development sitting adjacent to the main residential community in Hullbridge, and calls for community enhancements for that specific site that are inconsistent with the needs of Hullbridge as a whole.

1.3 In addition, we do not believe that Policy SER6 of the ASD is sound because we do not think that it is possible to proceed with the development of site SER6(a) (that part of the development envisaged prior to 2021) within the timescales set out in it. We say this because

- (i) the policy fails to address the already existing traffic, flooding and waste problems in Hullbridge, which can only be exacerbated by the proposed policy,
- (ii) the timetable as set out in policy SER6 is inconsistent with (a) timescales across other documents that have been issued by the Council in relation to this process, (b) information given in the past to residents and (c) indications given to Hullbridge's district councillors and others.

- 1.4 We therefore propose that the policy be amended to designate the development area covered by policy SER6 as a "reserve site", so that development can only take place before 2021 if
- (i) the Council is satisfied that, with the contributions to be made by developers on that site, the infrastructure needs of both the development and the village as a whole are met,
 - (ii) a real need for such housing on this site is clearly demonstrated

A. LEGAL COMPLIANCE

2 Failure to consult generally

2.1 When it started the process of creating a new Local Development Framework, the Council demonstrated its commitment to involving the district's residents in that process by issuing in 2007 a Statement of Community Involvement ("SCI"). The benefits of the SCI were listed¹ as

- (i) a chance for local people to influence the decisions that affect how land is used, and what development takes place, in their district,
- (ii) a more democratic form of planning,
- (iii) a greater sense of ownership of the district for local people,
- (iv) development of the district that better reflects the views of affected people,
- (v) improving the sense of community and inclusion within the district,
- (vi) an increased understanding of the issues and concerns that people have with regard to the district, and an input of local knowledge and expertise into the planning system.

2.2 Among the methods set out to ensure that everyone with an interest should be able to participate² is "seeking to consult a [sic] wide a range of organisations and people as possible within time and resource constraints on planning issues ... not just representative groups".

In particular, in respect of the production of the allocation documents (which includes the ASD), the Council says that it will consult with "*existing community groups and voluntary organisations*" in the pre-draft consultation process and the pre-submission public participation stage, in addition to this submission stage³. It can be inferred⁴ that this term is used by the Council to mean all potential interested parties other than statutory consultees.

2.3 The Council set out⁵ the list of such bodies that it said would be approached at each stage to gauge their views. This list included Hawkwell Resident's Association, Hockley Parish Plan Group and Hockley Resident's Association. However, as the SCI noted⁶, "*the consultee list is by no means exclusive - if the Local Planning Authority becomes aware of a group who have an interest in the planning of the district we will endeavour to involve them in the decision making process*".

2.4 As a general point, residents of Hullbridge have felt throughout that their views have been irrelevant to the process, and this remains the case. It is a widely-held view that the Core Strategy initially called for far fewer new houses in Hullbridge, but that the volume of building in our village was increased significantly because of pressure in other areas of the district. As residents see it, even what was considered to be an agreement to defer development until 2021 was reneged upon by the Council

¹ SCI, pages 3-4, section 2.1, Box 1

² SCI, page 5, section 3, Box 3

³ SCI, page 10, Table 2 (a)

⁴ From the headings in Table 2 (b)

⁵ In Table 5, on pages 25-26

⁶ On page 24

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without advertising it.

Residents take the view that they have been excluded from the process in practice, and that Hullbridge will get what the Council decides, irrespective of any concerns expressed, however detailed and constructive. This is despite the fact that the Council says that it "*will place special attention on trying to engage with people and groups who may have felt excluded from the process in the past*"⁷

- 2.5 At "group" level, beyond the Parish Council, there are two local community groups. When news of the Council's development proposals for Hullbridge started to reach the wider community in early 2010, the Hullbridge Action Group ("HAG") was formed by a number of concerned residents to ensure that the issues that they perceived were relevant to the proposals were properly debated. HAG made a written submission when the Core Strategy was to be examined by an Inspector, and did appear before that Inspector.

Acting independently of both Hullbridge Parish Council and HAG, our Group (The Hullbridge Village Community Group) was formed in early 2011 with the specific purpose of developing a Hullbridge Parish Plan based upon the concerns of residents as a whole. Those concerns (of which any new development in the village was only one of many) were identified through a community questionnaire issued to every household⁸. The district councillors have all been aware of our work from our inception.

- 2.6 Although we should have been, neither we nor HAG was consulted in the pre-draft consultation process relating to the ASD. Had the Council done so, the issues that are set out below in more detail could have been addressed before any document was published and put out to public consultation. We believe that this failure to listen, not just to ourselves but to residents as a whole, is a failure to comply with the policies in the Statement of Community Involvement. As such, the ASD cannot be in legal compliance with the Council's earlier documentation.

3 Specific consultation as per the Core Strategy

- 3.1 It has always been understood that special consideration should be taken of community views in Hullbridge. Further, the Sustainability Appraisal/Strategic Environmental Assessment Core Strategy Adoption Statement⁹ explains how the opinions of consultees have been taken into account, and sets out both areas where sustainability might be threatened, and what actions that should be taken to mitigate such risks. In Table 5¹⁰, one of the specific risks identified was that

"Some concern was raised as to the impact on existing communities of new development proposed at...Hullbridge – extensive consultation should be undertaken to ensure community concerns are addressed",

to which the response was,

"The Council has advised that there will be considerable community involvement in the preparation of the Allocations Development Plan Document. The Core Strategy also encourages input into the design process at a very local level ...".

- 3.2 Despite this, the Council has failed to consult as it specifically agreed to do, and this is a further failure

⁷ SCI, page 4, section 3. Although the Council may have been making reference to (e.g.) travellers, the same principle should apply to all residents in the district.

⁸ Set out in more detail below

⁹ Prepared as part of the procedures for adoption of the Core Strategy

¹⁰ Pages 16-17

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in legal compliance. That is, it was not just the fact that the 2007 Statement of Community Involvement charged the Council with a duty to consult (which it broadly failed to do in the case of Hullbridge). The Core Strategy itself specifically reinforced that duty – and undertaking – in respect of Hullbridge.

B SOUNDNESS

4 What is “soundness”?

- 4.1 According to PPS12, the inspector is asked to consider the “soundness” of the proposals set out in each document issued by the Council in relation to the LDF. One test of soundness is whether or not it is effective; i.e., whether it is deliverable, flexible and able to be monitored¹¹.

In turn, one element of deliverability is whether the timescales for development can be met. PPS12 points out that *“There is no point in proceeding with options for the core strategy which cannot be delivered as a result of failure to obtain the agreement of key delivery agencies”¹²*, stating that councils *“should be able to state clearly who is intended to implement different elements of the strategy and when this will happen”¹³* (our emphasis added).

5 Community cohesion

- 5.1 Community cohesion is considered by both the Council and residents as fundamentally important. As the Council puts it, *“Our objective is to make Rochford District a place where residents have a sense of belonging to and contributing to their communities”¹⁴*. As it also points out¹⁵, *“In the 2008 Place Survey 25% of respondents felt they would like to be more involved in decision making locally. A key way to achieve this will be maintaining an effective consultation procedure whereby residents feel valued and able to influence key local decisions”*.
- 5.2 As set out above, we do not believe that the Council has followed through on its commitment to consult. Indeed, it was that failure that led to our group being formed – in part to ensure that the residents’ views could be ascertained. To achieve this, the Group delivered a detailed questionnaire to each of the 2,850 properties in Hullbridge, allowing residents the opportunity to comment on various aspects of the village, including the proposed new development location. Around 40% of households submitted responses to us.
- 5.3 Our own consultation showed very clear results. An independent report setting out the results of that consultation was received in September 2012. The report provides a reasonably complete analysis of residents’ views regarding, not just this matter, but all issues affecting our village. It indicates that residents acknowledge and accept that additional homes will be needed in Hullbridge, if only to satisfy local demand. As such, Hullbridge residents are less concerned about the concept of new housing, but more about the practicality of delivering it.

¹¹ “PPS12: creating strong safe and prosperous communities through Local Spatial Planning”, DCLG, 2008, paragraph 4.44, on page

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¹² *ibid.*, Paragraph 4.28

¹³ Paragraph 4.45

¹⁴ The Sustainable Community Strategy 2010 – 2021, page 13

¹⁵ Also on page 13

However, residents were adamant that

- (i) any development should be particularly sensitive to the sense of community that residents feel so strongly (community cohesion), and
- (ii) development should not proceed until sufficient infrastructure improvements have been made, not just in respect of any additional houses in the village, but for existing problems as well. In particular, there are well-known and long-standing infrastructural issues (transport and flooding).

5.4 Unfortunately, Policy SER6 as it stands appears to be designed as a stand-alone development "adjacent" to the main part to Hullbridge, which goes completely against community expectations. The reference to a "green buffer" between new house and existing ones is testament to this. Hullbridge wants – and needs - new residents to shop and relax in the village, making use of the facilities we all enjoy at present. The new houses do not need their own retail outlet – indeed, the location was allegedly chosen precisely because of its proximity to the shops. Similarly, what the village as a whole needs is improvement to existing leisure facilities, not additional ones.

5.5 Part of the land being in Rawreth is an additional issue, a matter that has more to do with "community separation" than "community cohesion". We understand that some of the development that might be undertaken in that part of the site referred to as SER6 (b) is in fact in Rawreth, and not in Hullbridge. The Rawreth land adjoining that site has no existing properties on it so, from a community cohesion perspective, such new houses would, for all intents and purposes, be considered as part of Hullbridge. However, we are told that the parish boundaries cannot readily be amended.

5.6 A further issue in relation to SER6 (b) relates to the Coastal Protection Belt. Over many decades, the River Crouch has become wider and shallower, as the tides have eroded the river walls. Logic suggests that, over time, the Coastal Protection belt should move further way from the riverbank. However, it appears that, to permit development on site SER6 (b), the Coastal Protection Belt is being moved closer to the river; i.e., the CPB is being eroded to permit housing.

6 Transport

6.1 The community questionnaire also indicated that, while there will undoubtedly be demand for additional housing from existing residents and their families, that demand is considerably less than the total envisaged in Policy SER6. Moreover, although the policy supposes that 35% of new properties would be "affordable", the recent affordable housing survey suggested an affordable housing need in Hullbridge of 44 properties (indeed, the proposed affordable housing element in Policy SER6 would represent more than 50% of the needs of the entire district).

6.2 We imagine that the Council believes that any new housing will be of special interest to those who will be working outside of our village (Hullbridge having no appreciable employment). However, Hullbridge has no railway station, only one bus route and no Sustrans route; as a result, almost 90% of all trips in Hullbridge are made by car¹⁶.

6.3 Currently, the main local employment areas are towards Southend, Basildon and Chelmsford; of these, the largest growth in employment is expected at Southend Airport. However, Hullbridge is probably the residential area in the district furthest from the airport, and the least accessible. With significant new building already approved and/or envisaged much closer to the airport, it is therefore very unlikely that

¹⁶ Information provided by Highway Authority under Freedom of Information Act request - ANNEX 1

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new purchasers will be tempted to Hullbridge by the expectation of work at the airport.

The Council stresses access from Hullbridge to the other two main employment areas of Basildon and Chelmsford (accessed from the A127 and A130 respectively), and there is also an expectation in the ASD that a new employment centre will be developed close to the A127 to the west of Rayleigh. The main flow of traffic through Hullbridge (which includes traffic from Hockley, Ashingdon, etc) is south along Hullbridge Road, and right into Rawreth Lane to its end. At the end of Rawreth Lane, motorists turn left for the A127, Basildon and London.

Turning right at that point leads north towards Chelmsford and the A12. However, there is a "cut-through" road called Watery Lane, where Lower Road becomes Hullbridge Road. Watery Lane itself is a dangerous single-lane, pavement-less road with a number of blind bends, and which is subject to significant flooding (part of Watery Lane being below the water table). A right turn at the far end leads drivers through Battlesbridge to Rettendon Turnpike, providing access to Chelmsford and the A12. Alternatively, a left turn takes vehicles to the A1245, where traffic can turn right towards Rettendon Turnpike.

- 6.4 It is estimated that the proposed new housing will bring with it some 750-1,000 additional vehicles¹⁷. With 90% of all new trips in Hullbridge likely to be made by car, it is thus inevitable that significant new housing as envisaged under policy SER6 will result in a substantial increase in vehicle flows.
- 6.5 It is very unlikely that this increase can be mitigated through a viable Sustrans route before the end of the decade (which is contrary to statements in the Core Strategy and associated documents), since
- (i) westbound, Watery Lane cannot meet minimum requirements for a Sustrans route,
 - (ii) eastbound, a Sustrans route along Lower Road is probably not achievable because of its layout, which would prejudice any direct route towards the airport, and
 - (iii) southbound, there is scope for a route along Hullbridge Road, although it would require some land purchase as well as political will. Such a route would only go partway to Rayleigh, the most likely destination.
- 6.6 There is no funding available to upgrade or replace Watery Lane for a decade or more, since it is not considered viable in this economic environment. Accordingly, the Highway Authority's view is that current and future traffic should be discouraged from using it, and that traffic wishing to access Basildon and Chelmsford should be encouraged to use Rawreth Lane.
- 7 **The impact of the proposed development along Rawreth Lane**
- 7.1 Rawreth Lane is itself the site of considerable additional development of its own, set out under policies SER1 and BFR4. The SER1 site is expected to deliver 550 homes prior to 2021, of which one-third or more will need to use Rawreth Lane, plus all construction traffic will need to access the site from Rawreth Lane. The BFR4 site will provide at least 90 - and potentially 220 - additional homes, all of which will be accessed from Rawreth Lane.
- 7.2 Rawreth Lane already suffers from major congestion at various times of the day, so no development that

¹⁷ 1.6 vehicles per household as per FOI act disclosure from DVLA (4,533 in 2,850 households), plus additional company cars and commercial vehicles in Hullbridge but registered elsewhere - ANNEX 2

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will produce considerable extra traffic flows can be viable unless there is major investment to improve traffic flow along it. The Highway Authority says that it cannot justify such expenditure from its own resources, so these improvements can only be funded by developers.

- 7.3 Any new development as proposed in Hullbridge will have a dramatic negative impact on traffic flows in Rawreth Lane, and vice versa. What is really required is an assessment in respect of traffic flows all the way to the far end of Rawreth Lane. We note that, in conjunction with the Highway Authority, the Council intends at some stage to prepare a Transportation Strategy that will deal with these "joined-up" issues, but this is only to be a Supplementary Planning Document.
- 7.4 In the meantime, Policy SER6 is deficient in only calling for a traffic assessment relating to new housing in Hullbridge. Its Traffic Impact Assessment policy¹⁸ only requires action to address the "additional transport impacts". Oddly, only the Hullbridge development requires that "*the development of this site should contribute towards improvements to the highway network to facilitate movement along the western part of the network*", while the equivalent paragraph in Policy SER1¹⁹ places no similar requirement on the developer there.
- 7.5 Asking Hullbridge developers to fund infrastructure improvements in Rawreth is simply not feasible. While any Hullbridge developer should have to make significant infrastructure improvements in and around the Lower Road / Hullbridge Road junction, it makes no sense for that developer to have to make a financial contribution to road improvements 2-4.5 km away, especially when a significantly greater number of new houses is to be built along that road by other developers.
- 7.6 In practice, road traffic can only become easier in Hullbridge if unrestricted flow is possible up to the far end of Rawreth Lane and beyond. Indeed, potential improvements at Hullbridge are likely to have no impact at all unless and until road improvements in Rawreth Lane have been completed.

8 Flooding

- 8.1 The same principle of prior completion along Rawreth Lane applies to the flooding and waste issues in the area, since developments on the sites denoted by Policies SER1, BFR4 and SER6 will all make use the Rayleigh Waste Water Treatment plant operated by Anglian Water.
- 8.2 The southern part of the site set out in policy SER6 is subject to significant flooding, and has been so for many years. The development site is not formally in a Flood Zone, although adjacent land north of Watery Lane is in Flood Zone 3. However, we understand that Flood Zone designation is shaped by the number of insurance claims; naturally, there can be no claims on agricultural land, so the lack of Zoning is irrelevant.

Flooding is considered in policy SER6, as is waste water and mains supply²⁰. The developer is expected to address any upgrading issues with the statutory providers. Parts of Hullbridge have been subject to unpleasant smells from the plant on a regular basis. However, developers are only expected to address increased problems that may arise, and not the underlying issues. More significantly, it is inevitable that

¹⁸ ASD, paragraph 3.177.

¹⁹ ASD paragraph 3.31

²⁰ ASD, paragraphs 3.183-3.18

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the new housing envisaged in SER1 and BFR4 will add significantly to the pressures on flooding and waste water that the Anglian Water plant will need to tackle, yet the only requirement for SER1 developers is to develop a drainage strategy²¹.

- 8.3 The fact that Anglian Water apparently plays no formal part in the creation of the LDF suggests that it is reactive, rather than proactive. It does this because it is under a statutory obligation to deal with waste water and sewage²². We are concerned therefore that already insufficient facility will become even more inadequate before upgrading takes place. In our view, it is not possible to consider each of the two main developments in isolation, particularly when the developments in Rawreth Lane are to have such a major impact on what is proposed in Hullbridge.
- 8.4 Resolving flooding, sewage and flooding issues in Rawreth should therefore take priority. If the solution to road traffic issues in Hullbridge requires a prior solution to current and future congestion along Rawreth Lane, then by a similar argument, whatever upgrading to the flooding, sewage and drainage that is required to deal with both Hullbridge and Rawreth proposed developments needs to be in place before any development in Hullbridge is permitted.

9 When does the Council think these houses be built?

- 9.1 There has been considerable uncertainty as to precisely when any further development in Hullbridge might take place. Unsurprisingly, this has led to considerable frustration amongst residents who simply wish to know that any changes will maintain community cohesion and address already deficient infrastructure concerns.

Residents as a whole only became aware at a rather late stage of plans to permit the building of 250 homes in the period 2015-21, and a further 250 in the period 2021-2025. This resulted in a considerable outcry, which senior Council officials took on board. We believe that this outcry led the Council, on reflection, to the view that, while the proposed looked very sensible on paper, it had a number of deficiencies in reality.

Following this outcry, many people were advised that no building would take place on the proposed site prior to 2021. However, in a little-publicised move, the Core Strategy was adopted in December 2011 with the original timetable restored. As the Inspector will be aware, there were considerable delays in producing the Core Strategy, and eventually the Council was told either to adopt the Core Strategy "as was" or start the process afresh (although the Inspector did suggest an early review - a matter referred to in paragraph 11.3 below).

- 9.2 As it is, the Council's own documentation is inconsistent:
- (i) the ASD says that land can be developed from date of adoption of the Allocations Document²³,
 - (ii) the Core Strategy says that there will be no development in Hullbridge before 2015²⁴, and
 - (iii) the Hullbridge site referred to as "sites 15, 66, 124, 170, 174" in Appendix 1 of the 2012 SHLAA review (which approximates very closely that set out in Policy SER6) refers to development starting only in 2021²⁵.

²¹ ASD, paragraph 3.40

²² Minutes of Rawreth Parish Council meeting, 7th November 2012 – ANNEX 3

²³ ASD, Policy SER6, paragraph 3.159, page 56

²⁴ Core Strategy, Policy H2, page 47

²⁵ Strategic Housing Land Availability Assessment 2012 – SHLAA Review, pages 252-257

9.3 District councillors are also talking about deferring start dates. Independently, our district councillors have all been told by senior Cabinet members that no building will commence before 2021. One Cabinet member made a minuted comment to the same effect at a Parish Council meeting²⁶. It has separately been intimated to one district councillor that the Hullbridge site will be the last to be developed²⁷.

9.4 It is likely that the targets for five-year supply of new homes will be met without the need for any development on the Hullbridge site, because

- (i) a significant number of major developments have already come forward elsewhere in the district, rather greater than might have been envisaged when the Core Strategy was being prepared, and
- (ii) the announcement in recent days that HMP Bullwood (in-between Hockley and Rayleigh) potentially provides a major brownfield site that could go some way to meeting district housing supply.

With this in mind, it may well be the case that the Hullbridge site will indeed be the last to be developed.

10 A proposed amendment to Policy SER6

10.1 We are concerned that government policy providing a presumption in favour of sustainable development may make idle promises irrelevant. Because of this, it cannot come as a surprise that residents (in general) and we (in particular) are reluctant to rely solely on promises made by those driving this process, especially when some of them may well no longer be in office when the time for development in Hullbridge approaches.

10.2 We therefore believe that we need clear changes to Policy SER6 to provide certainty. This will provide residents with the comfort they need that no developments will proceed until the infrastructure deficiencies and community cohesion concerns are resolved. Those concerns can be summarized as follows:

- (i) there is continuing uncertainty about when any development (as envisaged in the Core Strategy will commence), although the policy currently anticipates that development could commence as soon as the Allocation Documents have been adopted,
- (ii) while there is local demand for housing, it is not sufficient to deal with the proposed supply of new homes,
- (iii) it is very unlikely that owners of properties on the proposed site will be employed in the Southend Airport development, and the road network towards Rayleigh, Basildon and Chelmsford, which is already not fit for purpose, will only deteriorate as more houses in both Hullbridge and Rawreth are built,
- (iv) the impact of those additional developments in Rawreth will also be felt in terms of flooding, sewage and drainage, which are already acutely under pressure in Hullbridge (indeed, part of the proposed site is subject to regular flooding), and
- (v) The need to prioritise a long-term solution to traffic congestion and drainage issues in Rawreth Lane points towards any development in Hullbridge being deferred until such time as those issues are addressed, especially since it is unreasonable for developers in Hullbridge to make

²⁶ Meeting on 10th September 2012 – ANNEX 4

²⁷ Copy of e-mail - ANNEX 5

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significant contributions to the necessary improvements to transport and drainage required to support development up to 3 miles away.

Unfortunately, it is not possible for the Council to set an explicit starting date for development in line with Policy SER6 since it cannot know when the following pre-conditions will have been met:

- (i) the development framework remains incomplete,
- (ii) the prospect that the forthcoming examination may require some amendments to the ASD, and
- (iii) the evidence set out in this letter strongly supports a proposal that development in Hullbridge should be deferred until the Rawreth Lane infrastructural improvements have been made.

- 10.3 With this in mind, we therefore propose that the timing of the first phase of building as anticipated in policy SER6 should be amended to come into line with both realism and current expectation. We openly acknowledge that both the Council and the Inspector may be reluctant to limit any flexibility in the Core Strategy; indeed, the Core Strategy has been tested to ensure that it is both flexible and able to be monitored.

On the other hand, we believe that the following changes in circumstances since the Core Strategy was approved are significant enough to warrant the changes to it that we propose:

- (i) the Council now has a clearer understanding of the concerns of Hullbridge residents, which it said was a crucial element in developing any proposals for the village,
- (ii) the Highway Authority policy against use of Watery Lane reinforces the need for the Rawreth Lane developers to secure enhancements to both the road and drainage networks that impact on Hullbridge before any Hullbridge development proceeds under Policy SER6, and
- (iii) a rapid flow of new developments has already reduced pressure on the need for development in Hullbridge to meet five-year housing need.

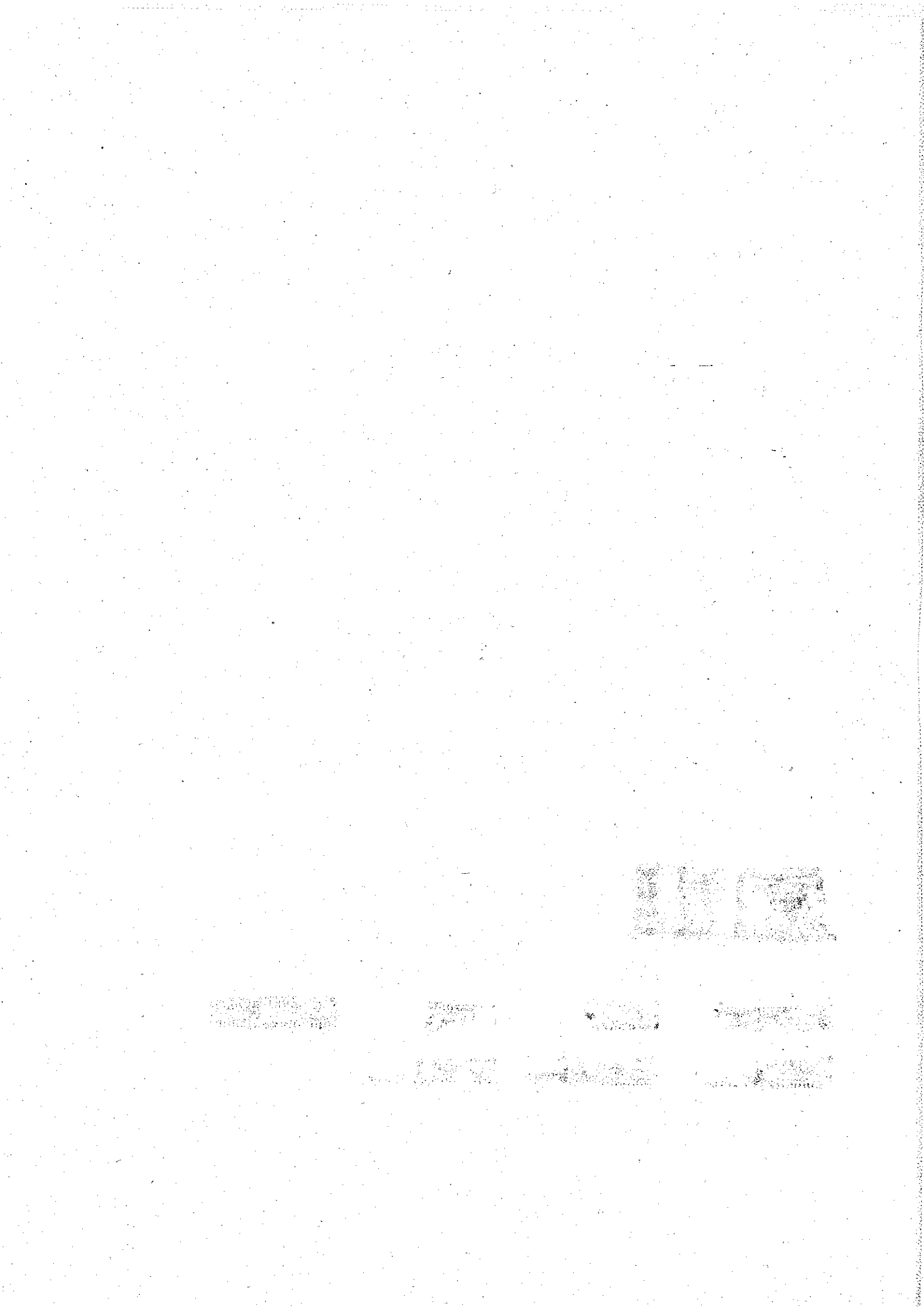
This uncertainty has resulted in the Council providing mixed messages about timescales.

- 10.2 We think that this uncertainty can best be overcome by amending Policy SER6 to make it some form of "reserve site" (which would be consistent with comments made to Hullbridge's district councillors and to others). We are not skilled in such drafting, but imagine that paragraph 3.159 of Policy SER6 could be re-worded as,
"The development area set out in this Policy shall not be released in whole or in part before 2021 unless it is required to maintain a five-year supply of deliverable housing land and a review of the plan strategy demonstrates a clear need for it at this location."

In any event, no development shall proceed before

- (i) the Highway Authority shall have determined that the road infrastructure improvements it deems necessary in the area of the proposed developments set out in policies SER1 and BFR4 shall have been completed, and
- (ii) the appropriate authority shall have determined that the necessary water and waste infrastructure improvements shall have been made by statutory providers to handle increased flows resulting from the additional residential housing envisaged in policies SER1, BFR4 and SER6

Priority will always be given to development proposals on site SER6 (a) unless a strong case can be made to the contrary."



11 Conclusion

11.1 The development of these plans has been a very distressing period for Hullbridge residents. As we approach the final stages, we wish to ensure that the creation of new housing in Hullbridge proceeds in a way that has the support of those who live here. As has been made clear, the issue is not about the principle of new houses, but rather how new residents can be integrated into our village in a way that does not impact further on those issues that already blight us.

11.2 Throughout, residents have felt that their views have not just been ignored, but not even sought. When we have made a noise, the Council appears to have simply told us not to worry, that it will all be fine at the end of the day, and that we should have faith in the Council. The Council has then simply continued along its way.

We do appreciate that, in 2011, the Council did find itself in a difficult situation vis-à-vis the Core Strategy, with the Inspector effectively telling the Council to adopt the draft Core Strategy in its then current form or start the process from scratch. We also appreciate that a Core Strategy was better than no Core Strategy. However, through circumstance, what resulted was a document driven by procedure and timetable, and not one based on proper consultation.

11.3 The Inspector did propose early review of the Core Strategy -- and those documents that follow on from it -- as an important counterbalance to the adoption of a less-than-right Core Strategy document. One year has passed since the Core Strategy was adopted, and we feel that the time is right for that review.

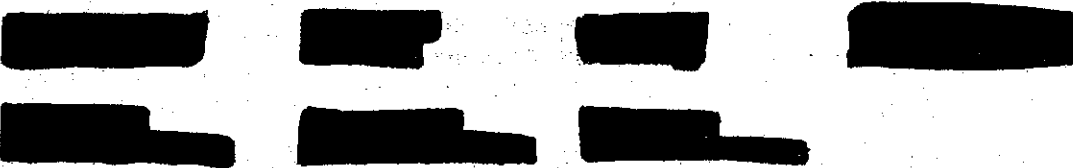
11.4 What we seek is the right Core Strategy for Hullbridge. We don't want "no housing at all"; we do need new housing but it must be located where it makes sense in practice, not where it looks right on a map. We must alleviate existing infrastructural problems, which will become much worse if development proceeds as set out in Policy SER6. We are not even sure that the Council wishes to pursue the Policy 11 in its current form.

We trust that the representations set out in this letter are clear, and that the Inspector will be minded to support the proposed amendment to the ASD as set out in paragraph 10.2 above.

Yours faithfully,



Secretary, on behalf of the Hullbridge Village Community Group



ANNEX 1

CANNON
CONSULTING ENGINEERS

Assessment of Workplace Destinations.

Key destinations identified by 2001 Census.

Micro Assessment of Rochford We	Number	%
Grange	12	0.4%
Ashington and Canewdon	13	0.4%
Downhall and Rawreth	96	3.1%
Foulness and Great Wakering	9	0.3%
Hawkwell North	9	0.3%
Hawkwell South	11	0.4%
Hawkwell West	16	0.5%
Hockley Central	36	1.2%
Hockley North	6	0.2%
Hockley West	34	1.1%
Hullbridge	764	24.6%
Lodge	6	0.2%
Rayleigh Central	6	0.2%
Rochford	67	2.2%
Sweyne Park	38	1.2%
Trinity	6	0.2%
Wheatley	77	2.5%
Whitehouse	66	2.1%
Other key destinations		
Basildon	452	14.5%
Southend on Sea	443	14.2%
Castle Point	155	5.0%
Chelmsford	128	4.1%
Havering	75	2.4%
Thurrock	73	2.3%
Other	513	16.5%
	3111	100%

Redistributed Hullbridge

Number	%
0.0013	0.5%
0.0014	0.6%
0.0101	4.1%
0.0009	0.4%
0.0009	0.4%
0.0012	0.5%
0.0017	0.7%
0.0038	1.5%
0.0006	0.3%
0.0036	1.4%
0.0006	0.3%
0.0006	0.3%
0.0070	2.9%
0.0040	1.6%
0.0006	0.3%
0.0081	3.3%
0.0069	2.8%
0.0474	19.3%
0.0465	18.9%
0.0163	6.6%
0.0134	5.5%
0.0079	3.2%
0.0077	3.1%
0.0538	21.9%
24.6%	100%

Transport Mode Split by 2001 Census

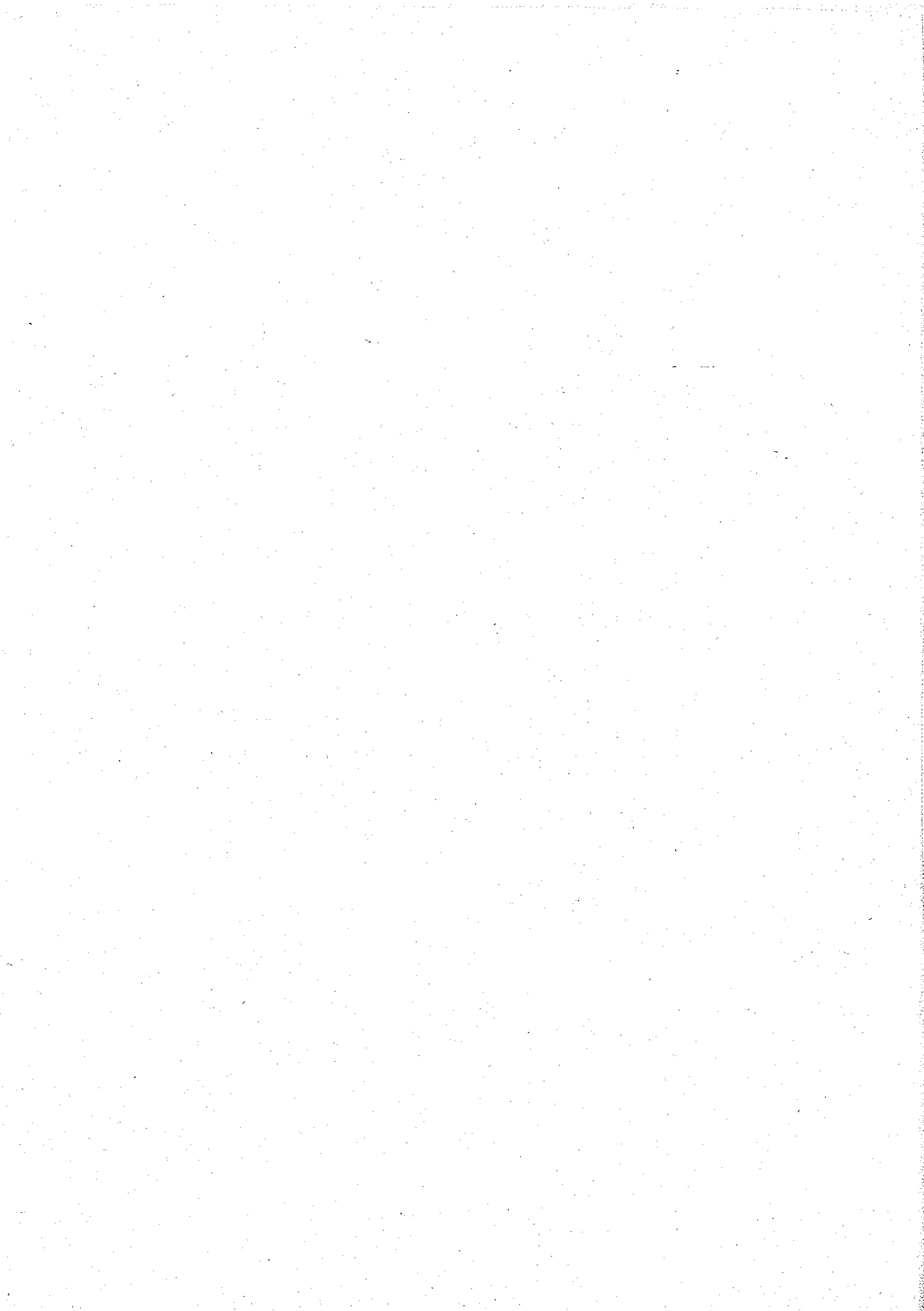
Mode of Transport	Number	%
WFH	274	9%
Underground	3	0%
Train	257	8%
Taxi	14	0%
Bus	116	4%
Car Driver	2028	65%
Car Passenger	179	6%
M/Cycle	51	2%
Cycle	37	1%
Foot	138	4%
Other	14	0%
	3111	100%

Re-distributed with (WFH, Underground, Train, Taxi and Other applied Car Driver)

Number	%
0	0%
0	0%
0	0%
0	0%
116	4%
2590	83%
179	6%
51	2%
37	1%
138	4%
0	0%
3111	100%

Census Review and Trip Rates

83% of Hullbridge trips as driver
6% of Hullbridge trips as passenger



ANNEX 2



Driver and Vehicle Licensing Agency
Head of Data Sharing Policy & FOI Team - D16
Corporate Affairs Directorate
DVLA
Longview Road
Swansea
SA6 7JL

[REDACTED]
e-mail: [REDACTED]

Email [REDACTED]
Website [REDACTED]

Your Ref [REDACTED]
Our Ref [REDACTED]

Date: 22 August 2012

Dear [REDACTED]

Freedom of Information Request

Thank you for your e-mail of 7 August requesting information under the terms of the Freedom of Information Act 2000 (FOIA).

You asked for:

The total number of vehicles registered with their address in Hullbridge, Essex, as of 1st July 2012.

As at 31 March 2012, there were 4,533 vehicles registered with addresses in the Hullbridge, Essex area. Statistics after this date are not yet available. It is anticipated that statistics as at 30 June 2012 will be available sometime mid September, however there would only be a slight variation to that figure.

The information which follows concerns the copyright conditions that apply to any information provided by the Agency and the procedures for making any complaint you might have about the reply. Please quote the reference number of this letter in any future communications about it.

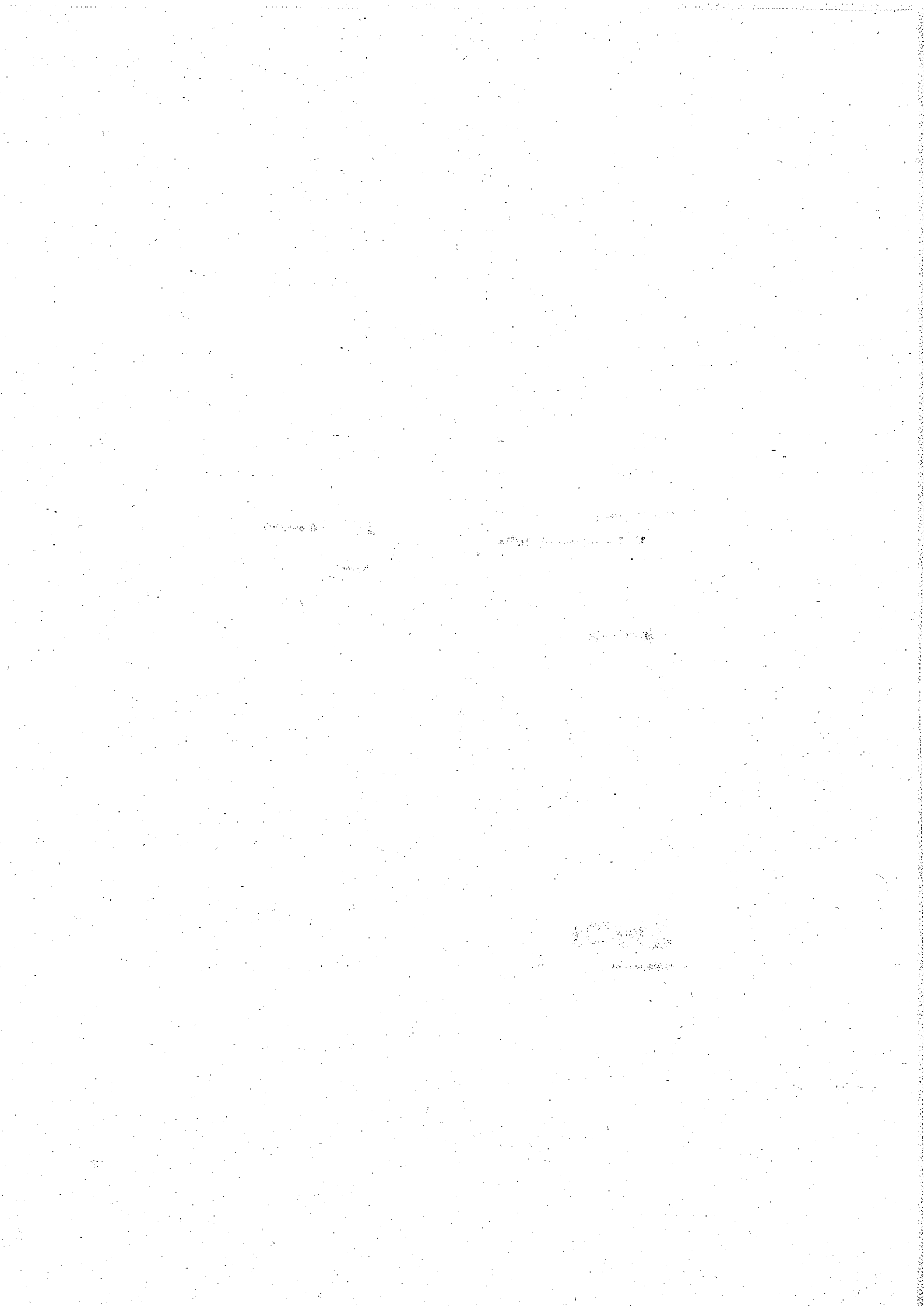
Yours sincerely

[REDACTED]

[REDACTED]
Head of Data Sharing Policy & Freedom of Information Team



An executive agency of the
Department for
Transport



Annex 3

EXTRACT FROM MINUTES OF THE MEETING OF RAWRETH PARISH COUNCIL HELD
ON 7th November 2012 AT 7.30pm AT THE VILLAGE HALL RAWRETH

Present:



In Attendance:



169. PRESENTATION BY [REDACTED] OF ANGLIAN WATER. [REDACTED] introduced himself to everyone at the Meeting. [REDACTED] acknowledged that since the sludge treatment works were installed at Rayleigh West there has been a problem with odour but that with a change in the AW business model this is set to change as sewage sludge will now be used in a recycling process and sludge and cake will be heated up to run large plants. [REDACTED] confirmed that the larger plants are sited at Basildon, Colchester and Ipswich, therefore the sludge treatment works at RW will close and the lime process will be taken away. [REDACTED] confirmed that with the closing of these processes there should be a reduction in traffic to and from the RW as the sludge currently comes onto the RW site in tankers and this will now go to the Basildon site which is due to be commissioned by January 2013. [REDACTED] advised that this date has been given as most complaints of odour are received in the summer months so AW are keen to move the processing before then. [REDACTED] confirmed that CCTV at RW is already showing a reduction in traffic movement and once the Basildon site is commissioned there should be several hundred traffic movements less per month. [REDACTED] advised that cake will continue to be stored at RW if needed but the cake will be odourless. [REDACTED] confirmed that he will keep the Clerk fully up to date with developments and at the moment he is not envisaging any delays.

Cllr [REDACTED] asked [REDACTED] if he would be willing to take questions during the Public part of the meeting which he confirmed he was happy to do, Cllr [REDACTED] then thanked [REDACTED] for taking the time to attend the meeting in person.

- a) Question to [REDACTED]. Is there any explanation for the recent smell? [REDACTED] advised he was not aware of any recent smell as none had been reported to him, however he was very willing to make enquiries and would try to ascertain if anything had changed or happened.
- b) Question to [REDACTED]. Is the reduction of traffic to RW only going to be open back lorries? [REDACTED] confirmed no, there will be a reduction in open back lorries and tankers, tankers by about 80% and the open lorries will be all but gone.
- c) Question to [REDACTED]. Does the raw sewage from this area go RW, and if so will the works be able to cope with all the proposed new housing. [REDACTED] advised that yes RW does take the raw sewage from the area, and yes it will be able to cope with the housing increase. [REDACTED] advised that Anglian Water are not consulted during things such as the LDG because they have a legal obligation to take waste, therefore if the plant were not able to cope the appropriate changes would be put in place to ensure



it does.

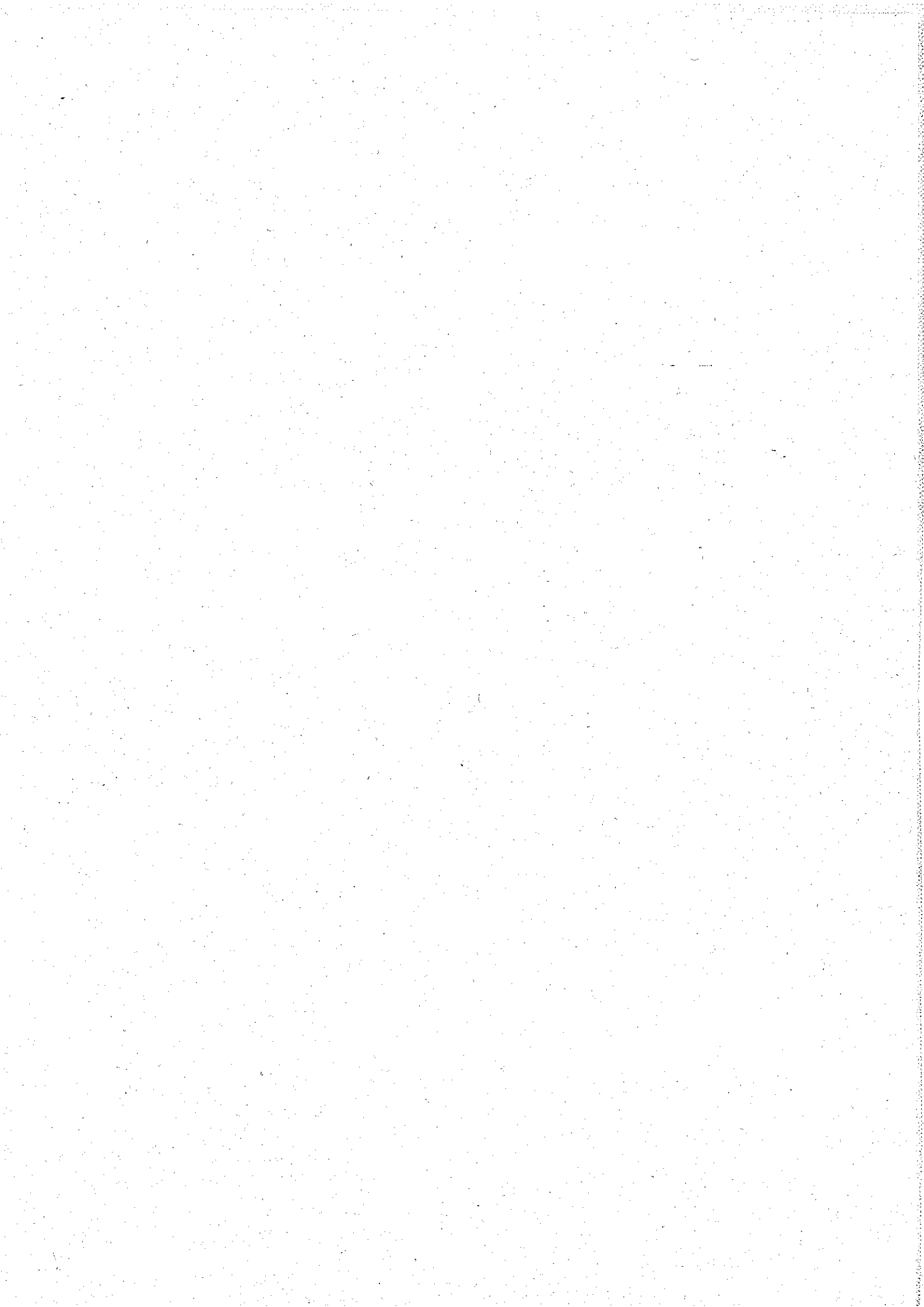
d) When walking towards Asda from Rawreth Lane, on the side where the older flats are situated there is a smell of human excrement.

e) There is still an issue with Rats in priory chase.

■ answered both the questions by confirming he would request a crew attend the area and lift the drain covers and look for signs of blockage or misrouted waste, ■ confirmed he would also ask the crew to look for signs of rats, and if evidence were found to install bait boxes.

f) The Parish Council are in the stages of drafting an emergency plan for the Parish of Rawreth, looking at the site of Rayleigh West, is there an emergency plan in place at Anglian Water should the site flood? ■ advised that AW do have an emergency planner who looks mainly at these sort of things. ■ confirmed that the tanks at RW are elevated and that flows in the works are monitored.

g) Have there been any problems with flows recorded recently as residents have been asking if storm drains are flowing in the area? ■ advised this is an area that is being looked at all over the country in conjunction with the Environment Agency to ensure there are no misconnections ie sewage into mains and surface into sewage.



ANNEX 4

495

supported and went well. The ceiling above the stage needed attention. The children's Christmas party would not be held this year. Parish Council Members were disappointed to hear about the party and Cllr [REDACTED] proposed, Cllr [REDACTED] seconded and it was resolved that an approach should be made to the HCA to find out the reasons for the party not to be held and enquire if the Parish Council could assist.

Hullbridge Village Community Group – it had already been reported the initial report on the Parish Plan questionnaire had been prepared.

Rochford Hundred Association of Local Councils – minutes of meeting held on 19/7/2012 had been circulated.

Senior Citizens' Welfare – Cllr [REDACTED] reported on the solar panels. A number of activities take place at the Centre.

Ad hoc meetings: none.

8058 - Correspondence – none.

8059 - Village reports/requests for items on next agenda:

Cllr [REDACTED] reported vegetation preventing clear visibility at junction with Church Road/Lower Road.

Cllr [REDACTED] reported dog fouling in Ferry Road had not improved. It was suggested an item be included in the next edition of Ripples stating the current fine for dog fouling.

Cllr [REDACTED] offered to scout the street lights every three weeks.

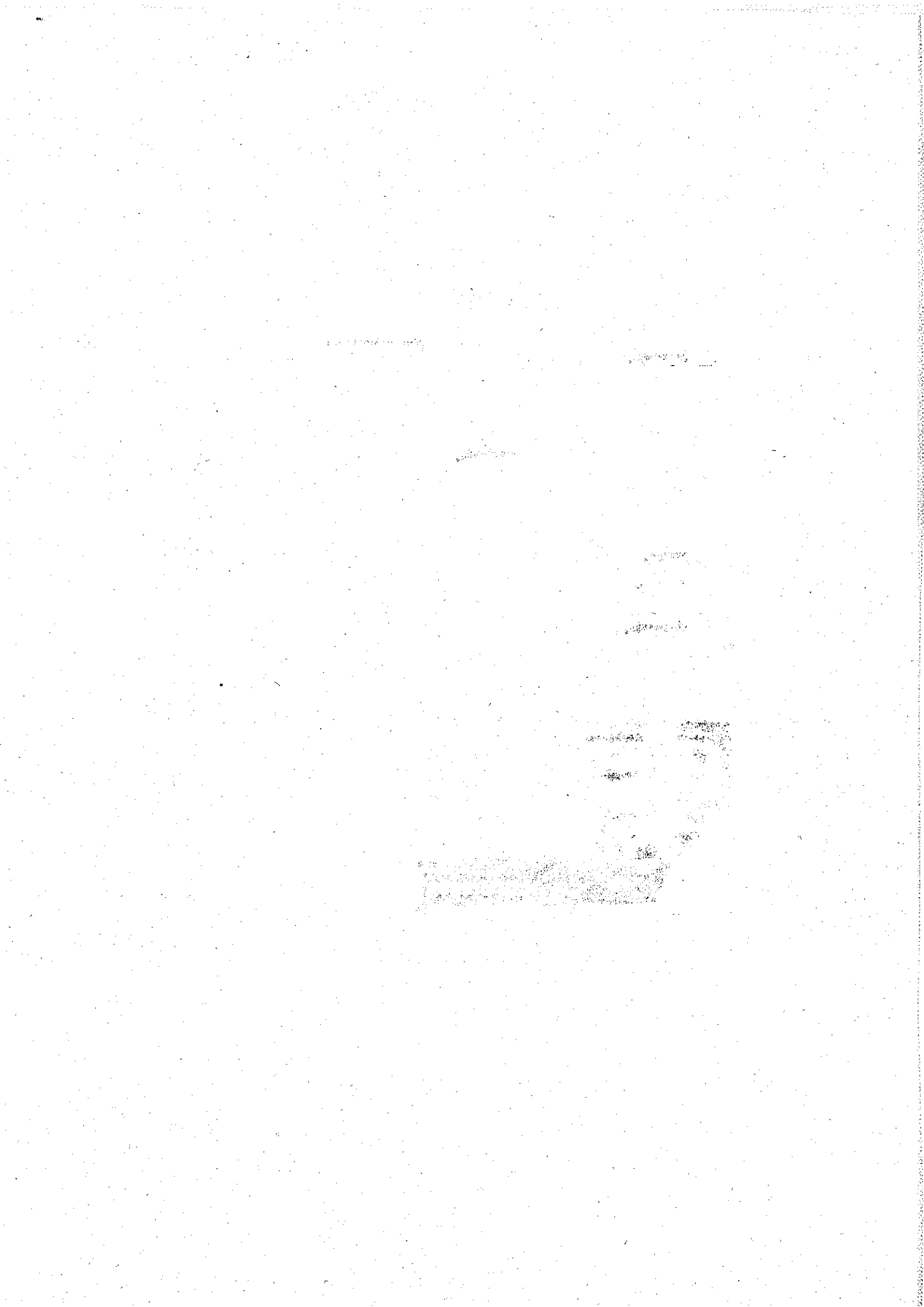
8060 - Public participation on general items – the following were mentioned/discussed: willow tree in Ferry Road, missing footpath fingerpost in Watery Lane, broken sign at junction Ferry Road/Lower Road, lack of car park entrance signs, banners on railings at junction of Ferry Road/Lower Road, old lamp column in Wallace Close not removed, L drivers practising in Pooles Lane car park, barking dogs tied up outside Riverside School during collection times.

Visiting Cllr [REDACTED] advised members of the public regarding dog fouling and unauthorised signs. He also stated that there were only 500 proposed new houses in the Core Strategy for Hullbridge, not 1350 as rumoured and they would not commence until after 2021. He stated he would advise the Clerk how many new dwellings were planned for Hockley Central.

20.50hrs the meeting was closed.

Chairman [REDACTED]

Date 8/10/2012



dates

ANNEX 5

From: [REDACTED]
Sent: 16 January 2013 09:04:50
To: [REDACTED]

Good morning [REDACTED]

Regarding the confusion with dates for the earliest development in Hullbridge. Myself and Cllr [REDACTED] had gleaned from verbal communication and the Draft Pre Submission Allocations DPD page 55, that the date would be post 2021. The paragraph on page 55 saying "The site will be safeguarded until post 2021 unless it can be demonstrated that it is required to be brought forward to contribute towards the districts five year housing supply". We have always been promised that Hullbridge would be held back until the last tranche, but that is only verbal and unofficial.

In the adopted Core Strategy, page 48; it states that 250 dwellings can start from 2015.

I had a meeting with [REDACTED] yesterday. The confusion has arisen as the paragraph mentioned above, refers to the whole 500 allocation and doesn't break it down to the individual phases.

The official figure is, as states in the CS. 250 between 2015/21 and 250 post 2021.

I hope that clarifies the official standing on earliest possible dates.

Best regards,
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

