

THIS LETTER IS SENT FROM FOUR PEOPLE



20th 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, wherever possible, every effort has been made to make our representations as succinctly as is deemed 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 To address these deficiencies, we 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*".

¹ SCI, pages 3-4, section 2.1, Box 1

² SCI, page 5, section 3, Box 3

- 2.3 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.
- 2.4 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*”.
- 2.5 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 without advertising it.
- 2.6 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
- 2.7 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.
- 2.8 Acting independently of both Hullbridge Parish Council and HAG, our 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

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

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.

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.

- 2.9 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 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 Thus, 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. The Council has failed to consult as it specifically agreed to do, and this is a further failure in legal compliance.

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.

⁸ Set out in more detail below

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

¹⁰ Pages 16-17

One test of soundness is whether or not it is effective; i.e., whether it is deliverable, flexible and able to be monitored¹¹.

- 4.2 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 agencies¹²”*, stating that councils *“should be able to state clearly who is intended to implement different elements of the strategy and when this will happen¹³”* (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. 35-40% of households submitted responses to us.
- 5.3 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.
- 5.4 However, residents were adamant that

¹¹ “PPS12: creating strong safe and prosperous communities through Local Spatial Planning”, DCLG, 2008, paragraph 4.44, on page 17

¹² *ibid.*, Paragraph 4.28

¹³ Paragraph 4.45

¹⁴ The Sustainable Community Strategy 2010 – 2021, page 13

¹⁵ At the same place

- (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).

5.5 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.

5.6 We should add one further point, which relates more to “community separation” than to “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.

5.7 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 new purchasers will be tempted to Hullbridge by the expectation of work at the airport.
- 6.4 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.
- 6.5 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.
- 6.6 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.
- 6.7 Contrary to statements in the Core Strategy and associated documents, it is very unlikely that this increase can be mitigated through a viable Sustrans route before the end of the decade, 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

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

¹⁷ There are currently 1.75-2.00 vehicles per household in Hullbridge (based on FOI act disclosure from DVLA)

- (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.
- 6.8 Since building a “new” Watery Lane is not considered viable in this economic environment for a decade or more, 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 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 Thus, new development as proposed in Hullbridge will impact on increased traffic flows along Rawreth Lane, and increased traffic flows resulting from any new development along Rawreth Lane will have a dramatic negative impact on traffic flows in and through Hullbridge. 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 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

¹⁸ ASD, paragraph 3.177.

¹⁹ ASD paragraph 3.31

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.
- 8.3 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 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.
- 8.4 Anglian Water apparently plays no formal part in the creation of the LDF, since it is under a statutory obligation to deal with waste water and sewage²²; this suggests that it is reactive, rather than proactive. 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.
- 8.5 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

²⁰ ASD, paragraphs 3.183-3.185

²¹ ASD, paragraph 3.40

²² Minutes of Rawreth Parish Council meeting, December 2012 – ANNEX 2

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 Throughout the development of the development framework, 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.
- 9.2 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.
- 9.3 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 11.4 below).
- 9.4 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.
- 9.5 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

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

²⁶ Meeting on 18th October 2012 – ANNEX 3

separately been intimated to one district councillor that the Hullbridge site will be the last to be developed²⁷.

- 9.6 In any case, the need to meet the targets for five-year supply of new homes may 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.

- 9.7 Nevertheless, we are concerned that government policy provides a presumption in favour of sustainable development. As such, 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 A proposed amendment to Policy SER6

- 10.1 We therefore believe that we need clear changes to Policy SER6 in order to 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

²⁷ Copy of e-mail at ANNEX 4

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

10.2 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.

10.4 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.

10.5 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.
- 11.3 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.
- 11.4 The Inspector did propose that an early review of the Core Strategy – and those documents that follow on from it – was important. One year has passed since the Core Strategy was adopted, and we feel that the time is right for that review.

11.5 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 in its current form.

11.6 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 10.5 above.

Yours faithfully,



Mr A Blakesley
Mrs B Blakesley
Mrs C Blakesley
Mrs D Blakesley
Mr E Blakesley