

14/00813/OUT

LAND BETWEEN WINDERMERE AVENUE AND LOWER ROAD, MALYONS LANE, HULLBRIDGE

OUTLINE PLANNING APPLICATION FOR DEVELOPMENT OF 500 DWELLINGS, TOGETHER WITH ASSOCIATED ACCESS, CAR PARKING, LANDSCAPING, OPEN SPACE AND RELATED WORKS

APPLICANT: SOUTHERN AND REGIONAL DEVELOPMENTS LTD.

ZONING: SER 6a and SER6b – SOUTH WEST HULLBRIDGE

PARISH: HULLBRIDGE AND RAWRETH

WARD: HULLBRIDGE AND DOWNHALL AND RAWRETH

1 THE SITE

- 1.1 The application site relates to an area of 21.79ha and is varied in shape to the south - west of the existing built up area of Hullbridge bounded by Windermere Avenue to the north and extending down to Lower Road to the south.
- 1.2 The site is currently farmland in use for grazing and hay making divided into seven fields of varying size each broadly rectangular in shape bounded by well kept hedges and fencing. To the middle part of the site exist a group of farm buildings accessed from Malyons Lane. The application site includes the farmhouse shown to be retained. The application site shows the bungalow to the east of the envelope of buildings “Little Malyons” to be redeveloped. The more recent bungalow “The New Bungalow” located on the north eastern edge of the farm building complex is shown excluded form the site by way of the site surrounding this bungalow to be retained.
- 1.3 Within the envelope of farm buildings are four telecommunications masts.

- 1.4 The site slopes downhill from Windermere Avenue to the north down to Lower Road at the southern edge of the site. The topography of the site varies from its highest point at some 22 metres Above Ordnance Datum (AOD) in the northern part of the site to the lowest point at some 5 metres AOD towards the southern boundary of the site with Lower Road.
- 1.5 This southern boundary of the site features a hedgerow with trees.
- 1.6 A group of trees located in the verge along Windermere Avenue just outside the northern boundary of the site comprising one Field Maple, Two Oaks and six Hawthorn trees are the subject of Tree Preservation Order TPO/00006/07.
- 1.7 The site is crossed west to east by Public Footpaths 2 and 7 which extend from Malyons Lane through the farm buildings area westwards to Highlands Road.
- 1.8 The majority of the site falls within The Parish of Hullbridge. Two areas of the application site south west and north west of the envelope of farm buildings are sited within the Parish of Rawreth. The administrative area for Rayleigh Town Council extends west of Hullbridge Road as far as the junction with Watery Lane to within 40m of the south west corner of the application site.
- 1.9 Following the adoption of the Allocations Plan in February 2014 the application site is allocated for residential development under Policy SER6a and SER 6b. The whole of the SER6a and SER6b allocation site allocation is identified to provide up to 500 dwellings over a total site area of 23.4ha at a density of 30 dwellings per hectare with associated open space. That part of the site nearest the existing built up area forming allocation SER6a is allocated from adoption. The north western area of the site allocated SER6b will be safeguarded from development until 2021 unless required in order to maintain a five year supply of housing land.
- 1.10 A concept masterplan showing all of the land within the SER6a and SER 6b allocation has been submitted with the application to indicate how the proposed development would relate to the parcels of land which would be developed.

2 PLANNING APPLICATION DETAILS

- 2.1 This application is an outline application with all matters reserved apart from access to the site which is shown by a new roundabout formed from the site onto Lower Road 100m east of the junction made with Watery Lane and by a road way extension of Malyons Lane into the site. Further pedestrian and cycle access is proposed from the site onto Windermere Avenue, Harrison Gardens to the north of the site and off The Priors to the south east.

- 2.2 The key matters for determination at the outline stage are therefore the acceptability of:-
- the principle of residential development of the site
 - the quantum of residential development proposed
 - the proposed access arrangements and
 - other planning considerations including issues such as flood risk, drainage and ecology.
- 2.3 The key plan for determination at this outline stage is the Concept Masterplan which shows the areas of the site intended for residential, play areas, open space and flood attenuation basins. If approved, this plan would form the basis for the working up of a detailed site layout at the Reserved Matters stage.
- 2.4 The application details as originally submitted illustrated off site works to provide a mini - roundabout for the Watery Lane / Lower Road / Hullbridge Road junction and the widening of the southern side of the Rawreth Lane / Hullbridge Road / Hambro Hill junction in front of Hambro Parade. These improvements were put forward by the applicant on the basis of their findings for the impacts of the scheme proposed in expectation to provide the basis for an agreement to form part of the grant of permission. These details were however revised on 21st August 2015 following consideration by the applicants of representations made to delete the mini – roundabout to the Watery Lane / Lower Road / Hullbridge Road junction and the provision of a new roundabout and junction improvement to the Rawreth Lane / Hullbridge Road / Hambro Hill junction.
- 2.5 The proposed development would access onto Hullbridge Road by way of a 28m diameter roundabout with 6m wide carriageway arms into the site. The roundabout would be formed slightly off centre in the alignment of the existing highway and extending into the application site.
- 2.6 A second access linking into the settlement would upgrade the existing access into Malyons Farm by improving Malyons Lane to a 5.5m wide carriageway reducing down to 4.6m wide carriageway entering the site with a 1.8m wide footway on the southern side and 1m wide footway widening to 1.5m on the northern side. The junction point where the existing Malyons Lane meets Elm Grove would be improved with minor widening and improvement to the kerb radius.
- 2.7 The transport assessment accompanying the application also shows improvements to provide a mini – roundabout to the junction of Watery Lane with Hullbridge Road and the improvement to junction of Rawreth Lane with

Hullbridge Road by carriageway widening on the southern approach to the junction from Hambro Hill to increase the width of the main carriageway approach to 10m on this side by taking within the highway the existing pavement and part of the service road to the parade to increase the capacity of the existing junction. These works are outside the application site.

- 2.8 The agents for this application have also submitted a planning application the subject of a separate report and recommendation under application 16/00162/FUL that would provide a new roundabout junction on third party land on the field corner to the junction as an alternative and uplift to the requirements to mitigate the impact of the development in highway terms and resolve wider long standing issues a the capacity of this junction which the applicants argue the development of this site can deliver.

- 2.9 The submitted Concept Masterplan identifies areas of the application site for each proposed use, including:-

- residential development (approximately 14.3ha)
- existing residential use to be retained comprising the existing farmhouse and an area of 0.19ha.
- highway land comprising the main spine road between Lower Road and Malyons Lane (1.1ha).
- open space (6.2ha) comprising natural and semi- natural green space through north south links through the site, green buffer to part of eastern edge, 0.06ha of children's play space including two local areas of play (LAPs) and one Local Equipped Area of Play (LEAP). The applicants argue that the minimum 0.02ha for outdoor youth provision could include junior youth sports pitches to the north western part of the site.

- 2.10 The application is accompanied by a number of supporting documents:-

- Planning Statement
- Design and Access Statement
- Transport Assessment
- Flood Risk Assessment
- Biodiversity Survey
- Reptile Survey
- Bat emergence and return to roost survey
- Great Crested Newt Survey
- Arboricultural Constraints report

- Phase 1 Contaminated Land Desk Study
 - Services Appraisal
 - Archaeological Desk based assessment
 - Statement of Community involvement
- 2.11 The application follows pre – application advice with County and District officers.

3 RELEVANT PLANNING HISTORY

- 3.1 The site excludes an area to the north western corner of the allocation that was the subject of an outline application for 18 No. houses including siting and access refused permission for reasons of Green Belt, inadequate unmade highway network serving the site, on street parking, inadequate garden, lack of social infrastructure and to a layout out of character with Windermere Avenue on 8th August 2005 under application reference 05/00400/OUT.
- 3.2 The site includes part of the allocation and site that was the subject of an outline application for 14 No houses refused permission for reasons of Green Belt, Coastal Protection Belt, too low density and inadequate unmade highway network serving the site, on 12th June 2007 under application reference 07/00132/OUT.
- 3.3 Other applications relate to the existing farm dwellings and telecommunications masts on the site.

CONSULTATIONS AND REPRESENTATIONS

Hullbridge Parish Council

- 3.4 Unanimously object to this application on the following grounds: Firstly that the infrastructure, particularly transport and drainage is inadequate even given the alterations proposed and the development is insufficiently integrated into the body of the village.
- 3.5 The applicants are giving Watery Lane equal importance with Rawreth Lane for access to the West. Although Watery Lane is well used, it is an unclassified road and we consider it to be no more than a rat run whose use should not be encouraged. We welcome the minor safety improvements to the Lane itself, the improvements to the junction with Hullbridge Road / Lower Road will encourage heavier use of Watery Lane and yet the applicant have made no proposals to ensure that it is not closed due to the flooding which are made even more necessary by this application.

- 3.6 The major route to the West from the Northern edge of Rochford District is and should remain Rawreth Lane and the proposals for improvements to the Hullbridge Road / Rawreth Lane junctions are inadequate for the increased traffic flows to Rayleigh and to the West. There will also be increased pressure on the A1245, not to mention the A127.
- 3.7 Although the application includes measure to prevent increased surface water run-off in most circumstances, there is still an increased risk to other properties and the transport network in the most extreme weather conditions. This could be alleviated by taking the surface water drainage of the Northern part of the site (all land north of Malyons Lane) northwards directly to the River Crouch – this would of course require slightly deeper than normal drains and the agreement of the owners of the farmland to the Northwest of the site.
- 3.8 Although not wishing to encourage car use, having only one vehicular access into the body of the Village (Malyons Lane) is unhelpful for the integration of the new properties. We would suggest at least one more vehicular access, with a 20mph speed limit on both the existing and proposed residential side streets which should be sufficient to discourage their use as rat runs.
- 3.9 Construction traffic should use Lower Road only to access the site.
- 3.10 Schooling – With reference to the Planning Statement (C11003) 2.16 we feel that the Secondary School provision is not satisfactory and there will be a deficit of places. Developers should make a suitable contribution to help finance any necessary further expansion to FitzWimarc or Sweyne Park School.
- 3.11 Health - As stated in the Planning Statement (C11003) 6.50, the Ferry Road Medical Centre is currently oversubscribed and although reference has been made to the Dome Surgery having below the optimum number of patients this Surgery is only part time and we understand was going to close.
- 3.12 We feel the Health provision is inadequate and will not properly accommodate the extra residents from the proposed new development.
- 3.13 Infrastructure / Flooding – Due to the submitted Traffic Survey being out of date we would like an independent survey carried out to verify the original findings and for data to be taken during normal activity and not during the School Holidays.
- 3.14 District Wide Developments – A number of developments in the District have already been completed or underway but we have not seen any infrastructure improvements apart from directly around the developments itself.
- 3.15 We do not think the Malyons Farm Development, if approved by Rochford District Council should start until sufficient infrastructure improvements have

been completed District wide, also further afield as the A1245 / A127, this will alleviate accessibility and sustainability issues of the site.

3.16 Status of the Applicant - Members are confused who the applicant is as previous public exhibitions have been conducted by Landhold Capital, but the application itself appears to have been submitted by Southern and Regional Developments Ltd. We are concerned that any promises made for the benefit of the Community will not be honoured by a future developer.

Rawreth Parish Council

- 3.17 Have the following comments and observations to make.

Access

- 3.18 The junction onto Lower Road is not adequate. Even with a new roundabout it is too close to Watery Lane and will only add to the traffic congestion further down the road at the Rawreth Lane junction. If (or rather when) Watery Lane is closed the development will add to the inevitable gridlock. The possible secondary access via Maylands Lane is even worse. The road is a rural road and is really not suitable for volume traffic, the simple T junction at the end will be dangerous.

Flooding

- 3.19 The developers acknowledge that the site slopes towards Watery Lane. At the moment fields take up quite a lot of water, yet Watery Lane and surroundings still flood. Building on fields reduces the capacity of the ground to take up water and will exacerbate the already bad flood situation. Even with attenuation tanks, balancing ponds etc. this development will increase the flood risk. The potential impact downstream on Church Road, London Road does not seem to have been considered

Infrastructure

- 3.20 Hullbridge is a village with village roads. These were not designed to take volume traffic and are already subject to severe traffic problems, it takes only a minor incident to impact on a radius of several miles and adding to the traffic will only make this worse.
- 3.21 The application mentions schools, healthcare etc. and does in fact say that Downhall Surgery will be able to take some extra patients. It also mentioned dentists and opticians in Rayleigh. It completely ignores the impact that the North of London Road development will have on local healthcare, schools etc. Southend Hospital has been on a black alert several times this winter, it is doubtful if they have the capacity to deal with all the potential residents of new developments.

3.22 There are few completely local employment opportunities so most new residents will be commuting to London/Basildon/Southend/Chelmsford. Despite the lovely words about walking and cycling most of them are going to drive to work, the station etc. which will bring them into the already congested Rawreth Lane area, to add to the extra traffic coming from North of London Road.

3.23 Overall it is hard to see how this application can be considered in isolation. Local roads are already at capacity before a single new house is built anywhere. The residents won't be living on the new development in isolation, they will commute, shop, go to school and will put more pressure on already overstretched facilities.

Rayleigh Town Council

3.24 Object due to insufficient infrastructure, lack of amenities such as senior school and doctors and concerns over flooding issues. The new developer should also require a new road access as this will impact on the Rayleigh area.

Mark Francois MP

3.25 As the local Member of Parliament I formally lodge my objection on several grounds including highways, flooding and raise concerns at the status of the applicants – who it appears are not the ultimate developer.

Highways

3.26 The Transport Assessment is flawed in that it is based on a traffic survey which is simply out of date. This is a fundamental point.

3.27 The application covers both sites SER6a (intended for development out to 2021) and SER6b (out to 2025) a decade into the future. Nevertheless the TA's traffic survey draws on a set of data and a number of accompanying photographs to support its case but the date / time group on the photographs reveal that they were all taken on 10th March 2010 – almost five years ago! As the application itself admits, this is in contravention of the 2007 Guidance on Transport Assessment (GTA) which states that “ the assessments should include recent counts (normally surveyed within the last three years).

3.28 The TA, rather weakly, attempts to explain this away by referring to another survey, of the Hullbridge Road/Rawreth Lane junction, which was conducted by Mayer Brown in conjunction with the proposed planning application for West Rayleigh (site SER1) in 2013. However, the Hullbridge application's TA does not offer similar data for the other key junctions, rather, it blithely states: “for the purposes of this Transport Assessment new surveys will be

commissioned in October/November 2014 to underpin the traffic impact analysis within this report.”

- 3.29 Even leaving aside that this appears to prejudge the outcome of an updated survey before it has been conducted (!) the TA gives no further details on whether or not such work has actually taken place and, if so, what the outcome was. This is unacceptable, as residents and other interested parties are currently being asked to respond to a consultation, an important part of which is the traffic impact, when the applicant has not provided up to date data on which to comment.
- 3.30 The TA itself points out that over 75% of those travelling to/from work in the Hullbridge ward do so by car. It focuses in particular on a number of key junctions in the local area and it already admits, in its Summary and Conclusions section that: “The addition of growth traffic on top of the base traffic using the junctions will exacerbate queuing, capacity and delay. Furthermore, the addition of traffic from the proposed development is likely to exacerbate delay, capacity and queuing at the junctions tested during the peak periods.” The key junctions identified include:-
- The site access junction with Lower Road
 - Lower Road/Watery Lane/Hullbridge Road junction
 - Lower Road/Coventry Hill/Ferry Road mini roundabout junction
 - Hullbridge Road//Rawreth Lane mini roundabout junction.
- 3.31 The Summary and Conclusions of the TA further states that: “In conclusion, the development of the allocated site on land west of Hullbridge is likely to impact on the local transport infrastructure within the area. This TA has outlined the accessibility and sustainability of the site with respect to local amenities and facilities. The traffic impact has also been assessed and mitigation proposed in accordance with the scale of the development impact and policy requirements.”
- 3.32 However, the detailed text of the TA does not appear to back this up. The applicant’s TA proposes to establish a new “compact roundabout” at the Lower Road/Watery Lane/Hullbridge Road junction, which it argues will improve flow over the current T junction arrangement. However, the experience at the three way junction of Rawreth Lane, Hambro Hill and Hullbridge Road, to the South, which has a mini roundabout with three approaches and which is already heavily congested at peak periods, suggests that this might not be the most efficient way of maintaining a good flow of traffic.

- 3.33 Moreover, the proposed Hullbridge development itself is likely to place additional pressure on the Hullbridge Road/Hambro Hill/Rawreth Lane junction, which will necessitate a major junction improvement. The application suggests one way of doing this but does not guarantee any funding for it, or for any other solution, stating only that: "It is acknowledged that a major improvement to this junction is being considered by ECC and contributions will be sought from the development to implement this improvement based on the scale of the development impact." Moreover, with regard to the Ferry Road/Coventry Hill/Lower Road junction, no specific mitigation measures are even proposed to alleviate the impact of the development.
- 3.34 In short, as it stands, there are serious failings in the way the applicant has addressed the highways aspect of this proposal and no guarantees as to how even the limited mitigation measures proposed would be funded.

Flooding and Flood Prevention

- 3.35 The area in question is known to have flooding issues and one of the major approach routes to the site, Watery Lane, has suffered from flooding in the past. The application includes a Flood Risk Assessment (FRA), which suggests a number of mitigation measures on the site itself, including Sustainable Drainage System (SUDS) solutions.
- 3.36 The FRA highlights that much of the proposed site is on London Clay, which it points out is effectively impermeable and which helps to prevent flooding from water collecting below the surface. However, this cuts both ways, as the clay layer also hinders surface water run-off from seeping through the soil during periods of very heavy rainfall – such as were experienced in the area in the summers of both 2013 and 2014. In these situations the ground can become saturated, which leads to an increased flood risk if suitable attenuation measures are not put in place.
- 3.37 Any development must therefore address not just the flood risk on the site itself but any potential "knock-on" effect on other nearby parts of Hullbridge, not least those residential streets backing onto the site itself, many of whose residents have experienced flooding issues in the past.
- 3.38 On behalf of the local residents I believe that the Council should seek clear assurances that any future developer would be prepared to fund whatever remedial works are necessary to protect these residents as well and the application, as currently drafted, does not appear to offer any such firm guarantees.

Healthcare provision

- 3.39 The application highlights that there are currently two GP practices in Hullbridge, but no dental practice. Given the general pressure on GP lists it

would be important to liaise closely with the Castle Point and Rochford Clinical Commissioning Group (CCG) and NHS England (Essex) to ensure that any further increase in population on the development (the application envisages around an extra 1,200 residents once the site is fully built out) can be properly accommodated.

3.40 Educational provision

3.41 There is also an issue regarding school places. While the application rightly acknowledges that there are currently spare places at Riverside Primary School in Hullbridge itself, it has less to say about the need for additional secondary school places, which the development is also likely to generate.

3.42 In practice, most secondary school pupils from Hullbridge attend one of the two secondary schools in Rayleigh, either FitzWimarc or, in many cases, Sweyne Park. Both schools are popular and the latter has recently converted to Academy status and also opened a Sixth Form. Given that both schools are normally oversubscribed it would be important to confirm that the developers would make a suitable contribution to help finance any necessary further expansion at either or both schools to accommodate the extra pupils likely to be generated by the development.

Status of the Applicant

3.43 Finally, I wish to point out that the status of the applicants is somewhat unclear. The public consultation exercise in 2014 was conducted by a company called Landhold Capital. I attended one of their public exhibitions earlier this year, which was generally poorly organised and where only a brief outline diagram of the site and a few sketches were available.

3.44 However, some months on, the planning application now appears to have been submitted by a different company, Southern and Regional Developments Ltd. This company are apparently not the ultimate developers of this site but rather appear to be a form of intermediary who, as I currently understand it, have been engaged to seek to obtain planning permission for the site – which would then presumably be marketed to a subsequent developer, at a higher price.

3.45 The difficulty which I think this poses for the Council is that any commitments given by the current applicant would not necessarily represent commitments given by the future developer. There is therefore a very real risk that the Council might grant planning permission in good faith – only to find that a future developer, having purchased the site, was unwilling to honour the commitments previously entered into. This is made worse by the fact that even the current applicant fails to provide firm guarantees about future financial contributions to address infrastructure issues. Given all of the

historical sensitivities surrounding this site I think it is very important that the Council should fully understand “who it is dealing with” and the current arrangements do not promote confidence in this regard.

Summary

- 3.46 In summary, I believe that this application is weak on both highways and flood prevention grounds, in the former case being based on a traffic survey which is clearly out of date. The applicants have identified a number of issues to be addressed but they appear to make few, if any, really firm commitments or specific financial contributions to address these issues – on the basis of which I believe the Council would be well advised to reject the application.
- 3.47 Moreover, there is a lack of transparency regarding the applicants, who, at present, do not appear likely to be the ultimate developer. There is therefore a risk that any commitments entered into will not be honoured by the ultimate developer, which could leave both the Council - and the residents it represents - in an invidious position further down the line.

Essex County Highways Highways

- 3.48 Advise that from a highway and transportation perspective the impact of the proposal is acceptable to the Highway Authority subject to the following mitigation and heads of conditions:-

All housing developments in Essex which would result in the creation of a new street (more than five dwelling units communally served by a single all-purpose access) will be subject to The Advance Payments Code, Highways Act, 1980. The Developer will be served with an appropriate Notice within 6 weeks of building regulations approval being granted and prior to the commencement of any development must provide guaranteed deposits which will ensure that the new street is constructed in accordance with acceptable specification sufficient to ensure future maintenance as a public highway.

- 1) Prior to commencement of the development, the proposed site roundabout access on Lower Road shall be provided as shown in principle on CCE dwg F221-101 rev A with clear to ground visibility splay.
- 2) No more than 200 units shall be occupied from the Lower road junction until such time as the proposed secondary site vehicle access on Malyons lane is be provided as shown in principle on CCE dwg F221-102.
- 3) Prior to commencement of development details of and timescale for the provision of the proposed access for pedestrian / cyclists at The Pories, Harrison Gardens and Windermere Avenue shall be submitted to and agreed by the Local Planning Authority.

- 4) Prior to commencement of the development, the areas within the curtilage of the site for the purpose of loading / unloading / reception and storage of building materials and manoeuvring of all vehicles, including construction traffic shall be provided clear of the highway.
- 5) Prior to commencement of the development a 1.5 metre x 1.5 metre pedestrian visibility splay, as measured from and along the highway boundary, shall be provided on both sides of the vehicular accesses.
- 6) The gradient of the any proposed vehicular access / garage drive / hard standing shall be not steeper than 4% (1in 25) for the first 6 metres from the highway boundary and not steeper than 8% (1in 12.5) thereafter.
- 7) Prior to commencement of the development details showing the means to prevent the discharge of surface water from the development onto the highway shall be submitted to and approved in writing by the Local Planning Authority.
- 8) No unbound material shall be used in the surface treatment of the vehicular access within 6 metres of the highway boundary.
- 9) No development shall take place, including any ground works or demolition, until a Construction Method Statement has been submitted to, and approved in writing by, the local planning authority. The approved Statement shall be adhered to throughout the construction period. The Statement shall provide for:-
 - i. the parking of vehicles of site operatives and visitors
 - ii. loading and unloading of plant and materials
 - iii. storage of plant and materials used in constructing the development
 - iv. wheel and underbody washing facilities
- 10) Any new boundary planting shall be planted a minimum of 1 metre back from the highway boundary and any visibility splay.
- 11) All independent paths to be a minimum of 2 metres wide, with details of lighting and drainage to be submitted to and approved in writing by the Local Planning Authority.
- 12) Each vehicular parking space shall have minimum dimensions of 2.9 metres x 5.5 metres.
- 13) All single garages should have a minimum internal measurement of 7m x 3m, All double garages should have a minimum internal

measurement of 7m x 5.5m, All tandem garages should have minimum internal measurements of 12m x 3m

- 14) The public's rights and ease of passage over public footpath no7 shall be maintained free and unobstructed at all times.

Travel plans & sustainable transport

- 15) Prior to occupation of the proposed residential development, the Developer shall provide and implement a residential Travel Plan including payment of a £3000 Travel Plan Monitoring fee to ECC. The plan is to be monitored annually, with all measures reviewed to ensure targets are met. The Developer shall be responsible for the provision and implementation of a Residential Travel Information Pack for every household for sustainable transport, to include six one day travel vouchers for bus travel approved by Essex County Council.

Highway works to form heads of terms to of legal agreement

Prior to first occupation, Highway works along the Lower road, Hullbridge Road and Rawreth Lane Corridor shall have been provided entirely at the Developer's expense.

This includes the:-

- i) Provision of a ghost right hand turn at the junction of Watery Lane / Lower Road with associated infrastructure as shown in principle of CCE dwg F221-101A.
- ii) Provision of a roundabout at the junction of Rawreth Lane and Hullbridge Road with associated infrastructure as shown in principle on CCE dwg F221-201.

Highways Agency

- 3.49 No objection

Minerals and Waste Planning Authority

- 3.50 No comments to make.

Rochford District Council Engineers

- 3.51 Advise numerous ditches exist within the area of the site which need to be taken into consideration accesses flows etc. Surface water drainage needs careful consideration as flooding is experienced in the general area.

Rochford District Council Principal Environmental Health officer

- 3.52 Consider that air quality issues at / near the junction of Rawreth Lane and Hullbridge Road have been sufficiently addressed by the proposal in light of the increased distance from receptors improved through – flow and additional capacity given roundabout proposal. Therefore do not require any further quantitative analysis of the junction for this application.
- 3.53 Advise that in line with the recommendations of the phase 1 contaminated land desk study report provided by the Nott Group , the inclusion of the standard model conditions would be required in any permission granted.

Environment Agency (initial consultation)

Flood risk

- 3.54 Our maps show the site lies wholly within Flood Zone 1. Flood Zone 1 is defined as the area of low flood risk having less than 1 in 1000 year annual probability of river or sea flooding.
- 3.55 A Flood Risk Assessment (FRA) by Cannon Consulting Engineers, referenced CCE/F221/FRA-03 and dated October 2014, has been submitted in support of this application, as required by the National Planning Policy Framework (NPPF). However, the FRA submitted with this application does not comply with the requirements set out in the National Planning Policy Framework and accompanying Planning Practice Guidance Reference IDs: 7-030-20140306 and 7-031-20140306. The submitted FRA does not therefore provide a suitable basis for assessment to be made of the flood risks arising from the proposed development. In particular, the FRA fails to adequately consider the fluvial flood risk posed by Beeches Brook, the watercourse located to the south west of the site.
- 3.56 Although this is outline planning permission we still require sufficient detail to determine if the development is feasible.

Overcoming our objection

- 3.57 You can overcome our objection by submitting an FRA which covers the deficiencies highlighted above and demonstrates that the development will not increase risk elsewhere and where possible reduces flood risk overall. If this cannot be achieved we are likely to maintain our objection to the application. Production of an FRA will not in itself result in the removal of an objection. The following information should be submitted to enable us to remove our objection.

Fluvial Modelling

- 3.58 As mentioned above, the risk posed by the fluvial watercourse Beeches Brook, located to the south west of the site is unknown, as we do not hold any modelled data for it. The FRA has not discussed this in great detail as a source of flood risk. This needs to be assessed further to establish the risk posed to the site and to ensure the risk is not increased on or off site. It should be noted that this could present issues to future occupants in obtaining insurance if the flood risk is not known.
- 3.59 We advise that modelling should be undertaken to accurately establish the risk to the proposed development in terms of potential depths and location of flooding from Beeches Brook. The watercourse should be modelled in a range of return period events, including the 1 in 20, 1 in 100 and 1 in 1000 year events, both with and without the addition of climate change. The flood levels on the development site should be determined and compared to a topographic site survey to determine the flood depths and extents across the site. The FRA should demonstrate that the proposed development will remain dry internally and its inhabitants will be safe in the event of a flood.
- 3.60 Once the modelling has been undertaken the results can be used to inform the design of the development and ensure it is in accordance with the NPPF.

Further Information

- 3.61 Section 2.2 of the FRA identifies that the site is at risk of surface water flooding in the south west corner in the 1 in 30, 1 in 100 and 1 in 1000 year events. As a result, the FRA proposes to sequentially site the residential areas outside of the potential 1 in 100 year surface water outline. Our updated Flood Map for Surface Water (uFMfSW) should not be used as a substitute for assessing the fluvial flood risk from Beeches Brook. These maps are not adequate to fully establish fluvial risk. The maps only indicate flooding which occurs as a result of the 'surface runoff' generated by rainwater (including snow and other precipitation) which: (a) is on the surface of the ground (whether or not it is moving), and (b) has not yet entered a watercourse, drainage system or public sewer.
- 3.62 The uFMfSW picks out natural drainage channels, rivers, low areas in floodplains, and flow paths between buildings, showing areas where surface water would be expected to flow or pond. It will only indicate flooding caused by local rainfall. It does not show flooding that occurs from overflowing watercourses, drainage systems or public sewers, caused by catchment-wide rainfall events or river flow.
- 3.63 It is also important to note that the uFMfSW does not take into account the impact of climate change. We usually ask that climate change is considered

over the lifetime of the development, which in this case is 100 years. Potentially this could increase the area of the site that is impacted by the design surface water event. However, the extent of such an event is currently unknown. The extent of the fluvial flood risk is also unknown.

- 3.64 Section 1.15 of the FRA identifies that the catchment area which feeds into Beeches Brook is approximately 4.5km². Potentially there is a relatively large area feeding into this watercourse that is currently not accounted for. It is also noted that the watercourse flows under Hullbridge Road at TQ 80609, 94142. It is not known if this is bridged or culverted, but this could act as a potential restriction to flood water adjacent to the site which should be assessed.
- 3.65 We are also aware that the site has been designated as a Critical Drainage Area (CDA), known as ROC2, by the South Essex Surface Water Management Plan (SWMP). The Strategic Flood Risk Assessment states that Watery lane to the south west of the site is known to flood from surface water. Pluvial modelling undertaken as part of the SWMP shows that the greatest flood depths coincide with Beeches Brook.
- 3.66 It should be noted that the underground surface water storage will not be sequentially sited. Underground storage crates are proposed to be located within the design surface water outline in the south west corner.

Sequential Approach on site

- 3.67 The sequential approach should be applied within the site to direct development to the areas of lowest flood risk. If it is not possible to locate all of the development in Flood Zone 1, then the most vulnerable elements of the development should be located in the lowest risk parts of the site. The FRA should assess the flood characteristics across the site and direct development towards those areas where the risk is lowest.

Finished Floor Levels

- 3.68 Proposals for "more vulnerable" development should include floor levels set no lower than 300 millimetres above the design 1 in 100 plus climate change flood level. Internal flooding is not appropriate for new residential development, as the development would not be considered safe for its lifetime. This is supported by the PPG: Flood Risk and Coastal Change Reference IDs: 7-060-20140306 and Reference ID: 7-054-20140306. We are likely to raise an objection where this is not achieved.

Flood Defence Consent

Under the terms of the Water Resources Act 1991 and the Land Drainage Byelaws, the prior written consent of the Environment Agency is required for

any proposed works or structures in, under, over or within 9 metres of the top of the bank of a main river or sea defence.

Surface Water Management

- 3.69 The proposed scale of development (21.79 ha) may present risks of flooding on-site and/or off-site, if surface water run-off is not effectively managed.
- 3.70 As we advised in our letter to your Head of Planning dated, 15 December 2014, we are no longer providing planning advice for developments over 1 hectare in size in Flood Zone 1. We are, however, working with Essex County Council, as your Lead Local Flood Authority, to ensure you continue to receive advice on the adequacy of surface water management proposals. We have notified Essex County Council of this consultation and they will be providing you a bespoke consultation response. We fully support the advice they provide.

Foul Water Disposal

- 3.71 The application form indicates that foul water will be discharged to the main sewer. Anglian Water Services should be consulted regarding the available capacity in the foul water infrastructure. If there is not sufficient capacity in the infrastructure then we must be consulted again with alternative methods of disposal.

Sustainability

- 3.72 Climate change is one of the biggest threats to the economy, environment and society. New development should therefore be designed with a view to improving resilience and adapting to the effects of climate change, particularly with regards to already stretched environmental resources and infrastructure such as water supply and treatment, water quality and waste disposal facilities. We also need to limit the contribution of new development to climate change and minimise the consumption of natural resources.
- 3.73 Opportunities should therefore be taken in the planning system, no matter the scale of the development, to contribute to tackling these problems. In particular we recommend the following issues are considered at the determination stage and incorporated into suitable planning conditions:
- 3.74 Overall sustainability: a pre-assessment under the appropriate Code/BREEAM standard should be submitted with the application. We recommend that design Stage and Post-Construction certificates (issued by the Building Research Establishment or equivalent authorising body) are sought through planning conditions.
- 3.75 Resource efficiency: a reduction in the use of resources (including water, energy, waste and materials) should be encouraged to a level which is

sustainable in the long term. As well as helping the environment, Defra have advised that making simple changes resulting in the more efficient use of resources could save UK businesses around £23bn per year.

- 3.76 Net gains for nature: opportunities should be taken to ensure the development is conserving and enhancing habitats to improve the biodiversity value of the immediate and surrounding area.
- 3.77 Sustainable energy use: the development should be designed to minimise energy demand and have decentralised and renewable energy technologies (as appropriate) incorporated, while ensuring that adverse impacts are satisfactorily addressed.
- 3.78 These measures are in line with the objectives of the NPPF, as set out in paragraphs 7 and 93-108, and are supported by Policy ENV9 of your adopted Core Strategy. Reference should also be made to the Climate Change section of the draft National Planning Practice Guidance, in particular: "Why is it important for planning to consider climate change?" and "Where can I find out more about climate change mitigation and adaptation?"

Updated reply to consultation

- 3.79 We refer to the email from Cannon Consulting Engineers, received on 25 January 2016, containing additional modelling of Beeches Brook. We are now satisfied that the FRA provides you with the information necessary to make an informed decision. We are therefore able to remove our previous holding objection, providing that the following points are considered:

Flood Risk

- 3.80 We have reiterated the key flood risk information from the FRA below. Although we are not objecting this must be reviewed in full before you determine the proposal as it contains essential information to inform the determination of safety. The proposed development will only meet the requirements of the National Planning Policy Framework if the following measure(s) as detailed in the Flood Risk Assessment submitted with this application are implemented and secured by way of a planning condition on any planning permission.

Condition

The development permitted by this planning permission shall be carried out in accordance with the approved Flood Risk undertaken by Cannon Consulting Engineers Referenced: CCE/F221/FRA-03 and dated October 2014 and the following mitigation measures detailed within the Flood Risk Assessment (FRA)

Finished ground floor levels are to be set no lower than 7.17 metres above Ordnance Datum (AOD); 300mm above the design 1% Annual Event Probability (AEP) flood level.

The mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the timing / phasing arrangements embodied within the scheme, or within any other period as may subsequently be agreed, in writing, by the local planning authority.

Reason: To reduce the risk of flooding to the proposed development and future occupants.

Flood Risk Assessment

A Flood Risk Assessment (FRA) undertaken by Cannon Consulting Engineers, referenced CCE/F221/FRA-03 and dated October 2014, has been submitted in support of this application, as required by the National Planning Policy Framework (NPPF). The proposed consists of the development of up to 500 residential dwellings and associated access, car parking, landscaping and public open space. This type of development is classified as 'more vulnerable' according to in Table 2: Flood Risk Vulnerability Classification of the Planning Practice Guidance (PPG): Flood Risk and Coastal Change.

We previously objected to this application because the watercourse to the south of the site, Beeches Brook, had not been modelled and the extent of the fluvial flood risk to the site was unknown. Cannon Consulting submitted several modelling reports in order to investigate issues raised. This modelling was intended to assess surface water risk rather than fluvial flood risk. We therefore issued a holding objection on this basis and asked for further information. Our main concern was that the modelling provided was intended for a different purpose and did not provide a detailed reflection of fluvial flood risk. The FRA has not been revised.

Modelling

A 1D-2D ESTRY-TUFLOW model has been produced and has now been undertaken by Arcadis Consulting Limited, formerly Hyder Consulting Limited, and a Technical Modelling Note submitted, referenced 5001-UA008231-UU41R-1.0 and dated 22 January 2016. The model has included a 2.1 km length of Beeches Brook as detailed in Figure 1-1 of the report. In our previous response, we asked for greater detail of the representation of the channel in the modelling. We held concerns as to how the channel was represented in the modelling. It is understood from the model report that further cross sectional survey has now been undertaken, which included a number of structures.

Simulations were run for the 50%, 5%, 1%, 1% with climate change, 0.1% and 0.1% with climate change AEP fluvial events. The outputs of the model show that the south western end of the site and the road (Watery Lane) adjacent to

Beeches Brook is at risk of flooding in the 5% current day flood event. This area of the site is therefore considered to fall within Flood Zone 3b, the functional floodplain, where water has to flow or be stored in times of flood. This area of the site must not be developed unless its use can be considered 'water compatible' or 'essential infrastructure', as classified in Table 2: Flood Risk Vulnerability Classification of the PPG. We are therefore pleased to note that this area of the site will be public open space.

The modelling shows that the proposed residential development area is located wholly outside all events up to and including the 0.1% AEP event, including allowances for climate change. A section of the site to the south and the Watery Lane access road is expected to flood. The table below summarises the flood depths expected on the site/access route in a range of events linked to the danger for people classification as set out in Table 13.1 of the Defra/Environment Agency R&D document FD2320.

It can be seen that depths of up to 0.43m are expected on the site and access route in the design flood event. This equates to a danger for people classification of 'danger for most'. Section 2.7 of the FRA states that the southern limit of the residential area will be set above 7m AODN and therefore the buildings should remain dry in the design event.

Safe Access and Egress

Although the entire residential area is located outside of the 0.1% AEP event inclusive of climate change, you should consider whether it is advisable to use Watery Lane as an access point, as it is expected to flood frequently. The modelling submitted shows that the lane falls within the functional floodplain. It appears that there are alternative access points to the north east of the site outside of the 0.1% AEP event inclusive of climate change.

You are the competent authority on matters of evacuation or rescue, and therefore should assess the safety of the route of access/egress from the site. You should be satisfied with the proposals. The FRA has not considered safe access and egress.

Advisory Comments

As flood risk modelling undertaken by third party has been used in support of this application and the Environment Agency has applied a risk based approach to the assessment of this model. The Environment Agency has not undertaken a full assessment of the fitness for purpose of the modelling and can accept no liability for any errors or inadequacies in the model.

Surface Water Management

As stated in our previous responses, the Lead Local Flood Authority, Essex County Council, are the statutory consultee on surface water. We have not reviewed the surface water element of this proposal.

Summary of Flood Risk Responsibilities for your Council.

We have not considered the following issues as part of this planning application as they are not within our direct remit; nevertheless these are all very important considerations for managing flood risk for this development, and determining the safety and acceptability of the proposal. Prior to deciding this application you should give due consideration to the issue(s) below. It may be that you need to consult relevant experts outside your planning team. The following paragraphs provide guidance to assist you in determining matters which are your responsibility to consider. · Whether insurance can be gained or not it is vital that those ultimately owning any new developments are able to access insurance. Insurance is generally a prerequisite for the vast majority of mortgages, and therefore underpins local housing markets. If insurance is not available, a property could become impossible to buy or sell; therefore it is important that a new development is insurable from a flood risk perspective.

The guidance note produced by the Association of British Insurers (ABI), which complements the NPPF, includes a number of key recommendations. One of these is to ensure that flood risk is mitigated to acceptable levels. The ABI recommends that a risk of no more than a 1 in 100 year annual probability, inclusive of climate change, is necessary to give developments a good chance of accessing flood cover at a competitive price. Preference is given to flood avoidance (i.e. raised floor levels) over flood resistance and resilience measures. This advice should be used to influence the design of the development and used in helping to inform your decision. You may wish to give consideration to the availability of insurance and wider implications on the development, of tidal flooding up to and including the 1 in 100 year return period event inclusive of climate change. The guidance note can be viewed on the ABI's website. · Safety of People (including the provision and adequacy of an emergency plan, temporary refuge and rescue or evacuation arrangements) You need to be satisfied that the proposed procedures will ensure the safety of future occupants of the development. In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise LPAs formally consider the emergency planning and rescue implications of new development in making their decisions. We advise you take advice from your emergency planner, the emergency services and the Local Resilience Forum. We do not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals as we do not carry out these roles during a flood. Our involvement with this development during an emergency will be limited to

delivering flood warnings to occupants/users covered by our flood warning network.

Safety of the building

The development has been designed to provide refuge above the predicted flood levels. Given that refuge is identified as a fall back mitigation measure it is important that the building is structurally resilient to withstand the pressures and forces (hydrostatic and hydrodynamic pressures) associated with flood water. We advise that supporting information and calculations are submitted to you to provide certainty that the buildings will be constructed to withstand these water pressures. This aspect falls outside of our remit therefore advice should be sought from either a structural engineer or your building control team.

Flood recovery measures (including flood proofing and other building level resistance and resilience measures)

We recommend that consideration is given to the use of flood proofing measures to reduce the impact of flooding when it occurs. Both flood resilience and resistance measures can be used for flood proofing. Flood resilient buildings are designed to reduce the consequences of flooding and speed up recovery from the effects of flooding; flood resistant construction can help prevent or minimise the amount of water entering a building. Flood proofing measures include barriers on ground floor doors, windows and access points and bringing in electrical services into the building at a high level so that plugs are located above possible flood levels. Consultation with your building control department is recommended when determining if flood proofing measures are effective. Further information can be found in the Department for Communities and Local Government publications 'Preparing for Floods' and 'Improving the flood performance of new buildings'.

Sustainability of the development

The purpose of the planning system is to contribute to the achievement of sustainable development. The NPPF recognises the key role that the planning system plays in helping to mitigate and adapt to the impacts of climate change, taking full account of flood risk and coastal change; this includes minimising vulnerability and providing resilience to these impacts. In making your decision on this planning application we advise you consider the sustainability of the development over its lifetime.

Essex County Council Urban Design

- 3.81 In principle, the development proposal for 500 no. dwellings within the allocated site is acceptable, with the total number of proposed dwellings being provided through a context informed range of densities. The allocation for this

site is 500 dwellings, phased across two site areas, with each area being allocated 250no. dwellings.

- 3.82 Access to the site is via Lower Rd and Malyons Lane with various suggested pedestrian and cycle links through to the adjacent residential areas; again, in principle these access points are supported.

The layout

- 3.83 The general layout and development blocks (although indicative) are lacking substance and suggest a regimented urban block structure rather than a development on a countryside edge site. The proposed built edge of the lower layout and its proximity to the western boundary offers little opportunity to use landscaping to mitigate the development at the country edge of the site.

- 3.84 There are a number of potential issues with the indicative framework plan, predominantly towards the eastern boundary where the layout connects to the existing residential areas. The existing residential areas adjacent to the site back onto the development. The indicative framework plan indicates a block layout which fronts onto the backs of the existing dwellings.

- 3.85 Para 6.23 of the planning statement sets out the need to “provide tree and hedge planting to the eastern and northern boundaries, (as appropriate) to create a green buffer in perpetuity between the new and existing development. This has been shown on the masterplan in order where possible to protect residential amenity and privacy, incorporate SUDS, whilst promoting integration.”

- 3.86 I believe there are a number of number of alternative options which will improve the layout and appropriately address the requirements of paragraph 6.23. Some of these options could include:-

- a single row of dwellings to back onto the existing rear gardens on the eastern dwelling edge (in context with the 2 storey dwelling on Monksford Drive, The Pories and Abbey Road);
- create smaller development blocks to address (back onto) the existing communities while fronting onto the relocated green corridor;
- re-route the green corridor into the development, incorporating POS, streets and other recreational spaces, while addressing the backs of the existing community.

- 3.87 These alternatives should explore improving the eastern boundary and how it can be integrated into the development without at the expense of the green infrastructure or pedestrian/cycle route.

- 3.88 The main access spine road appears to get very close to the western boundary, again there needs to be sufficient space for screening landscaping to the country edge.

- 3.89 Careful thought and consideration needs to be applied when addressing the existing property which the proposed development surrounds. The

existing dwelling is shown to be entirely overlooked to the north and eastern boundary.

- 3.90 There are a number missed opportunities to create key vistas within the site.
Road hierarchy

- 3.91 The indicative layout starts to establish design principles for the road hierarchy. At this level of detail I would like to begin to see some of the early design concepts of how the road design respond to particular character areas of the site. At present, the road network is largely drawn the same, with many of the indicative road widths being disproportionate to the area/development parcel they serve. The road hierarchy needs to reflect the different nature of the spaces created relating both to the house types, street frontage and materials specified. When the layout is produced in greater detail I would like to see how this is achieved.

Landscaping

- 3.92 The indicative landscaping layout appears to simply fill up the undevelopable areas of the site rather than being properly integrated within the layout, streets and spaces. The lack of a landscape strategy that supports the layout is a key omission and will need to be addressed at the next detailed design stage.

Summary

- 3.93 The indicative proposal of 500no.dwellings is an achievable proposal. There are a number of fundamental development principles that need to be addressed as the proposals develop to a detailed design scheme.
- 3.94 **Essex County Council Economic Growth and Development (Education Provision)**
- 3.95 Advise with regard to the sufficiency of early years and childcare places, the proposed development is in Hullbridge Ward with Downhall and Rawreth and Hockley West adjacent and accessible. According to sufficiency data collected Summer 2014; childcare places in Hullbridge are at 92% capacity and 99% capacity in Downhall and Rawreth. Hockley West only has one provider with sufficient capacity to meet the needs of the development.
- 3.96 This development is located within the priority admissions area of Riverside Primary School which forecasts indicate will have sufficient capacity to meet needs of the proposed development.
- 3.97 The proposed development is located within the Rochford secondary (Rayleigh) forecast planning group. The forecast planning group has an overall capacity of 2,590 places. The Rochford secondary (Rayleigh) forecast planning group is forecast to have a deficit of 116 places by the school year 2017 – 18.
- 3.98 In view of the above request a financial contribution to mitigate the development impacts on early years and secondary education provision. On the basis that the final development result in 500 houses with two or more bedrooms, the early years and childcare contribution would be £555,840 and the secondary contribution would be £1,645,700.

Essex Bridleways Association

- 3.99 We are very disappointed to note that the application does not make any provision whatsoever for equestrian access within the development. From the basic drawing that has been included within the Planning Statement, it is evident that there are proposals for some green links through the site, but the proposed pathways seem to be purely footpaths with a provision for some cycleways, with access points for cyclists and pedestrians only. Footpath 300-2 runs through the proposed site, yet no mention has been made of this in the Planning Statement whether this will remain as currently or how any diversion will be treated, and this is a significant omission on the part of the applicant. We therefore request that the applicant is required to state their intentions with regard to the public rights of way already on site.
- 3.100 It should be noted that, within the Rochford District Council's Local Development Framework Allocations Document, under SER6 (to which this development relates) point 3.186 of this policy states that The site should facilitate links and enhancements to the local pedestrian/cycling and bridleway network; these links should accompany both phases of development and reference to this requirement has actually been made in the Planning Statement. The developer therefore has chosen to ignore the Council's own framework, despite pointing out the requirement in the supporting documents. It is noted that in point 6.29 of the Planning Statement, reference to other modes of transport is made, together with point 6.30 making reference to the public rights of way clearly defined and attractive footpaths connecting the site to local footpaths and public rights of way will aim to promote walking as a mode of transport for users of the site. Point 6.35 also makes reference to pedestrian and cycle routes through the site. With this statement, we therefore conclude that the developer does not feel it necessary to concord with policy, thereby providing minimal access and enhancement to the proposed development. In the light of this, we therefore consider that the proposal does not concord with the LDP Allocations Document and request that, to redress this omission, the developer is required by planning condition to provide bridleway access incorporated within the development. This requirement is further confirmed in point 6.70 where the developer specifically states a willingness to contribute via planning obligation to the improvement of Highways/Transportation/Footpaths as part of any granting of planning permission.
- 3.101 We note also that the Transport Statement only mentions data on point 4.2.8 for pedestrians and cyclists and does not make reference to any other user. In the light of these points, we suggest that the following enhancements to the rights of way network are included within the Masterplan for this development:-
- Equestrian access is included throughout the development, ensuring that the access points proposed in the Transport and Access Statement are useable by all vulnerable road users, cyclists, pedestrians and equestrians. Whilst it is not necessarily the choice of horse riders to ride through a residential estate, the site has the potential to safely link the

bridleway network to the south of Watery Lane with other rights of way in the east. Officers should remember that bridleways are best-value multi user paths as they can be used by all vulnerable users, including walkers, cyclists and wheelchair/mobility scooter users as well as equestrians.

- We note the intention to improve the section of Watery Lane and Lower Road for the benefit of cyclists; we therefore request that such improvements also facilitate the use of this section of road for equestrians as well as cyclists.
- Footpath 300-2 from Malyons Lane to Pickerels Farm is upgraded to bridleway status. This will link the development to Highlands Road giving safe access for equestrians and cyclists avoiding the section of Watery Lane. Much of this footpath is already in ownership of the applicant and is shown within the development area.
- Footpath 300-1 is also upgraded to bridleway status enabling access to the coastal path from Highlands Road, again for both equestrians and cyclists. Whilst we accept that the last two points may well be difficult to achieve as they are dependent upon the land ownership over which these footpaths run, their feasibility should be explored as part of the consideration of planning conditions which will be subject to any granting of outline permission.

3.102 It should be remembered that riding is an immensely popular pastime, especially with women and children, and has a great impact on fitness and a healthy lifestyle for these groups, who are frequently targeted in schemes to increase their participation in sport. The Planning Statement does make reference to the health and fitness of residents and how this development can be planned to improve it. We therefore assume that increased bridleway access is a positive suggestion and will concord with the applicants aim for health benefits for the site. It should be noted that the main deterrent to the uptake of riding is the danger on the roads for horse riders. There are over 3000 road accidents involving horse riders per annum in this country and it is vitally important to the equestrian sector that safe access is built into all new developments. We therefore request that, should Committee be minded to approve this outline application, that conditions are imposed so that access is provided to include all users, including provision for horse riders.

Essex and Suffolk Water

3.103 We would advise you that our existing apparatus does not appear to be unduly affected by the proposed development; however, the proposed roundabout in Lower Road will affect an existing fire hydrant / washout. The cost of repositioning this apparatus will be recovered from the Developer.

3.104 We would have no objection to the development subject to compliance with our requirements. Consent would be given to this development the condition that new water mains are laid in the highway on the site, and a new water connection is made onto our Company network for each new dwelling for revenue purposes.

3.105 There is a possibility that the Company will need to reinforce our existing network to enable the proposed development to be supplied with water. The cost of these works will be recovered from the Developer.

Northumbrian Water

3.106 Advise their existing apparatus does not appear unduly affected by the proposed development however the proposed roundabout in Lower Road will affect an existing fire hydrant / washout. The cost of repositioning this apparatus will be recovered from the developer.

3.107 Have no objection to the development subject to compliance with our requirements. Advise consent would be given to this development on the condition that new water mains are laid in the highway on the site and new water connection is made onto our company network for each new dwelling. There is also the possibility that the company will need to reinforce our existing network to enable the proposed development to be supplied with water. The cost of these works will be recovered from the developer.

Rochford District Council Environmental Protection Unit

3.108 The Head of Environmental Services reports that the application does not include a report on air quality issues relating to the Lower Road / Hullbridge Road / Rawreth Lane area. Without such a report, it is not possible to comment on the impact of the development on the area.

3.109 In line with the recommendations of the Phase 1 Contaminated Land Desk study report provided by the Nott Group on behalf of the applicant, the inclusion of the standard model contaminated land conditions would be required in any permission granted.

Essex County Council Sustainable Urban Drainage (first round reply to consultation)

3.110 As the Lead Local Flood Authority (LLFA) this Council provides informal advice on SuDS schemes for the larger sites (over 1ha). The Environment Agency remains the statutory consultee on surface water.

3.111 In providing advice this Council look to ensure sustainable drainage proposals comply with the required standards as set out in the following documents:-

- The CIRIA SuDS Manual (C697)
- Defra's draft SuDS National Standards
- Essex County Council's (ECC's) emerging Sustainable Drainage Systems Design Guide.

Lead Local Flood Authority position

3.112 Having reviewed the Flood Risk Assessment and the associated documents which accompanied the planning application, we wish to place a holding objection on the planning permission based on the following:

3.113 Inadequate FRA

Reason

The FRA submitted with this application does not comply with the requirements set out in paragraph 9 the Technical Guide to the National Planning Policy Framework. The submitted FRA does not therefore provide a suitable basis for assessment to be made of the flood risks arising from the proposed development.

In particular, the submitted FRA fails to

1. Provide sufficient information about fluvial flood risk, which means that there is uncertainty regarding the ability for the site to discharge surface water effectively. SuDS features are proposed to be located within the area of the site that may be affected by fluvial flooding.
2. Provide information about the exceedance routes for the site. What are the proposed routes for each section of the site?
3. Indicate how runoff from the highway will pass through the necessary number of treatment stages before discharging off site.

Provide information about intrusive ground tests, which should be used to support information gained from BGS mapping.

Overcoming our objection

3.114 You can overcome our objection by submitting information which covers the deficiencies highlighted above and demonstrates that the development will not increase risk elsewhere and where possible reduces flood risk overall. If this cannot be achieved we are likely to maintain our objection to the application. Production of an FRA will not in itself result in the removal of an objection. Our objection will be maintained until an adequate FRA has been submitted.

3.115 We also have the following advisory comments:-

3.116 The site is located within the ROC2 CDA. Where possible the development should aim to provide betterment to help mitigate against the current flooding issues.

3.117 Below ground storage is proposed to be sited within in the surface water flooding area to the south west of the site.

3.118 A range of below ground storage features have been suggested however it's not clear why these are being sited below ground especially when they are in

areas of public open space which could have a dual function acting as flood storage during rainfall events and providing recreational areas when dry.

- 3.119 Where does the public open space to the west of the site drain? If it forms part of the catchments draining to the onsite attenuation features then the additional volume of rainfall caused by climate change falling on the permeable area of the site should also be included in any storage calculation.
- 3.120 Has an additional 10% been added to the total impermeable area of the site to allow for urban creep?
- 3.121 A summary of storage requirements should be provided as well as any assumptions that have been made for the calculation.
- 3.122 Any drainage features proposed for adoption by Essex County Council should be consulted on with the relevant Highways Development Management Office.

Second round reply to consultation

- 3.123 I have been sent the consultants reply to my consultation response dated 23rd January 2015. Following the submission of this information I have reassessed the proposed surface water drainage strategy for the above mentioned planning application.
- 3.124 As the Lead Local Flood Authority (LLFA) this Council provides informal advice on SuDS schemes for the larger sites (over 1ha). The Environment Agency remains the statutory consultee on surface water.
- 3.125 In providing advice this Council look to ensure sustainable drainage proposals comply with the required standards as set out in the following documents:-
- The CIRIA SuDS Manual (C697)
 - Defra's draft SuDS National Standards
 - Essex County Council's (ECC's) emerging Sustainable Drainage Systems Design Guide.

3.126 Lead Local Flood Authority position

- 3.127 Having reviewed the Flood Risk Assessment and the associated documents which accompanied the planning application, we wish to support the application for planning permission.
- 3.128 The proposed development will only meet the requirements of the National Planning Policy Framework if the following measures as detailed in the Flood Risk Assessment CCE/F221/FRA-03 submitted with this application and the above mentioned additional information submitted in reply to our consultation response are implemented and secured by way of a planning condition on any planning permission.

Condition 1

Prior to commencement of the above development a detailed drainage strategy must be submitted for approval to the local authority. It should be based on principles of Sustainable drainage, in line with the approved FRA

CCE/F221/FRA-03 permitted by this planning permission. The detailed drainage scheme should follow mitigation measures detailed within the FRA including:-

- Limiting the discharge from the site to 3.5l/s/ha for all events up to the 1 in 100 year storm plus a 30%.
- Provide attenuation storage (including locations on layout plan) for all storm events up to and including the 1:100 year storm event inclusive of climate change and urban creep.
- Ensuring the appropriate level of treatment for all runoff leaving the site, in line with table 3.3 of the CIRIA SuDS guide.
- Provide information about exceedance routes should be provided to indicate what route flows would take should a feature become blocked and cause surface water flooding.

The mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the timing / phasing arrangements embodied within the scheme, or within any other period as may subsequently be agreed, in writing, by the local planning authority.

Reason

To prevent the increased risk of flooding, both onsite and offsite, and minimize the risk of pollution of surface water by ensuring the provision of a satisfactory means of surface water control and disposal during and after development.

Condition 2

The development hereby permitted shall not be commenced until such time as a scheme to minimise the risk of offsite flooding caused by surface water run-off and groundwater during construction works has been submitted to, and approved in writing by, the local planning authority. The scheme shall be implemented as approved.

Reason

- The National Planning Policy Framework paragraph 103 states that local planning authorities should ensure flood risk is not increased elsewhere by development.
- Construction may lead to excess water being discharged from the site. If dewatering takes place to allow for construction to take place below groundwater level, this will cause additional water to be discharged. Furthermore the removal of topsoil's during construction may limit the ability of the site to intercept rainfall and may lead to increased runoff

rates. To mitigate against increased flood risk to the surrounding area during construction therefore, there needs to be satisfactory storage of/disposal of surface water and groundwater which needs to be agreed before commencement of the development.

Condition 3

Prior to commencement of the development the applicant must submit a Maintenance Plan detailing the maintenance arrangements including who is responsible for different elements of the surface water drainage system and the maintenance activities/frequencies.

Reason

To ensure appropriate maintenance arrangements are put in place to enable the surface water drainage system to function as intended to ensure mitigation against flood risk.

Condition 4

The applicant must keep yearly Maintenance Logs of maintenance which should be carried out in accordance with any approved Maintenance Plan.

Reason

To ensure the SuDS are maintained for the lifetime of the development as outlined in any approved Maintenance Plan so that they continue to function as intended to ensure mitigation against flood risk.

Any questions raised within this response should be directed to the applicant and the response should be provided to the LLFA for further consideration. If you are minded to approve the application contrary to this advice, we request that you contact us to allow further discussion and/or representations from us.

NHS England, Essex Area Team

- 3.129 The proposal comprises a residential development of 500 dwellings, which is likely to have an impact on the NHS funding programme for the delivery of primary healthcare provision within this area and specifically within the health catchment of the development. NHS England would therefore expect these impacts to be fully assessed and mitigated by way of a developer contribution secured through a Section 106 planning obligation.
- 3.130 It is noted that the planning statement submitted along with the application includes a Healthcare Impact Assessment (HIA) of the proposed development. The following comments are further to a review of this HIA:-

- When assessing the impact of a proposed development NHS England review the capacity of practices within a 2km radius of the proposed development and not 3km as shown within the HIA prepared by the developer. 2km is considered to be a reasonable distance to travel to access such services, in line with policy and guidance, which encourages the protection and promotion of local services that are within easy walking distance of housing, replacing short car trips where possible.
 - The fact that a practice is open for the registration of new patients is not an indication as to whether or not the practice has spare capacity. Under the terms of a GP contract the practice is unable to close its list to new patients without prior discussion and agreement from NHS England. NHS England would only agree to this in extreme circumstances.
 - The formula for a developer contributions to mitigate the impact of this development as detailed in section 6.53 of the Planning Statement is consistent with the formula used by NHS England.
 - Discussions have taken place with the Riverside Medical Centre and options to increase capacity at this practice, to accommodate patient growth as a result of the above development, are being explored. It is anticipated that capital works to be undertaken as a result will be funded wholly or in part from the developer contribution sought.
- 3.131 NHS England have recently carried out a review of GP services to identify capacity issues throughout Essex. This development is likely to have an impact on the services of 1 GP practice within Hullbridge.
- 3.132 This GP practice does not have capacity for the additional growth that would arise as a result of this development. Therefore a developer contribution towards capital funding to increase capacity within the GP Catchment Area would be required.
- 3.133 In line with the Government's presumption for the planning system to deliver sustainable development set out in the National Planning Policy Framework (NPPF), a financial contribution of £164,560 is sought. It is a requirement of NHS England that payment of developer contributions would be provided before the development is first occupied.
- 3.134 NHS England is satisfied that the basis and value of the developer contribution sought is consistent with the presumption in favour of sustainable development set out in the NPPF.
- 3.135 Assuming the above is considered in conjunction with the current application process, NHS England would not wish to raise an objection to the proposed development. Otherwise the Local Planning Authority may wish to review the development's sustainability if such impacts are not satisfactorily mitigated.
- 3.136 The terms set out above are those that NHS England deem appropriate having regard to the formulated needs arising from the development. However, if the developer wishes to negotiate an alternative position NHS

England would welcome ongoing dialogue that closely correlates with the need established.

Anglian Water

- 3.137 Advise there are assets owned by Anglian Water or those subject to an adoption agreement within or close to the development boundary that may affect the layout of the site. Anglian Water would ask that the following text be included within your Notice should permission be granted. "Anglian Water has assets close to or crossing this site or there are assets subject to an adoption agreement. Therefore the site layout should take this into account and accommodate those assets within either prospectively adoptable highways or public open space. If this is not practicable then the sewers will need to be diverted at the developers cost under Section 185 of the Water Industry Act 1991. or, in the case of apparatus under an adoption agreement, liaise with the owners of the apparatus. It should be noted that the diversion works should normally be completed before development can commence."
- 3.138 The foul drainage from this development is in the catchment of Rayleigh-West Water Recycling Centre that at present has available capacity for these flows.
- 3.139 The sewerage system at present has available capacity for these flows providing connection is made via manhole 7601 in Malyons Lane and/or manhole 5201 south of Malyons Lane. If the developer wishes to connect to our sewerage network they should serve notice under Section 106 of the Water Industry Act 1991. We will then advise them of the most suitable point of connection.
- 3.140 The surface water strategy/flood risk assessment submitted with the planning application is not relevant to Anglian Water and therefore this is outside our jurisdiction for comment and the Planning Authority will need to seek the views of the Environment Agency. We request that the agreed strategy is conditioned in the planning approval.

Essex County Council Specialist Archaeological Advice

- 3.141 The Heritage Assessment submitted with this application identifies that there is the potential for archaeological remains in this area. The Rochford Historic Environment Characterisation shows that this landscape has ancient origins and the landscape features survive well. The documentary evidence indicates that there was a property on the site of Malyons Farm since at least 1351. Cartographic evidence shows the presence of the farm, with a green lane leading to it on the first Edition Ordnance Survey Maps as well as a possible moated enclosure. The Historic Environment record also indicates the presence of an enclosure to the south of Malyons Farm.

The following recommendations are in line with the National Planning Policy Framework.

RECOMMENDATION: A Programme of Trial Trenching followed by Open Area Excavation

1. Archaeological evaluation by trial trenching shall be undertaken prior to the submission of any detailed layout proposals, with a report submitted with the reserved matters application. This work shall be undertaken to the standards required by the local planning authority and specified in an archaeological brief issued by the local planning authority acting through its historic environment advisors.
2. An archaeological mitigation strategy detailing the excavation strategy shall be agreed with the local planning authority through its historic environment advisors and submitted with the reserved matters applications.
3. No development or preliminary groundworks can commence until the satisfactory completion of fieldwork, as detailed in the mitigation strategy, and signed off by the local planning authority through its historic environment advisors.
4. The applicant will submit to the local planning authority a post-excavation assessment (to be submitted within six months of the completion of fieldwork, unless otherwise agreed in advance with the Planning Authority). This will result in the completion of post-excavation analysis, preparation of a full site archive and report ready for deposition at a registered museum, and submission of a publication report (to be completed within two years of the completion of fieldwork, unless otherwise agreed in advance with the Planning Authority, through its historic environment advisors).”

Essex County Council consultant arboriculturalist

There are a number of significant trees growing along Lower Road as well as field boundary trees.

Given the proximity of the trees to the proposed development, within, and adjacent to the site, I would recommend requesting the applicant supplies an Arboricultural Impact Assessment (AIA).

The AIA should include the following elements:-

- 1 - Tree survey and plan, the trees should be assessed based on their condition, longevity and amenity value using the methodology provided in BS 5837 (2012)
- 2 - Arboricultural impact assessment in accordance with BS 5837 (2012)
- 3 - Tree protection plan, detailing the proposal set against the trees, their constraints and areas where temporary protective barriers, ground protection or special construction techniques are required.

4 - Arboricultural method statement containing information regarding the protection of trees during the intensive phase of development, any special construction techniques required to ensure the trees can be retained whilst building the proposed, location of storage of materials, welfare facilities, site office, location of new services and how these will be constructed within the rooting area of any retained tree.

Rochford District Council Strategic Housing

- 3.142 The affordable dwellings should be tenure blind and mixed throughout the scheme. There should be 35% provision of affordable housing would meet a substantial part of the affordable housing need in the District. There should be a split between 80% of the affordable homes to be rented (i.e. social rent and/or affordable rent) and 20% intermediate housing (e.g. shared ownership).
- 3.143 Based on a proposal for 500 homes, 175units (35%) should be affordable. Our review of housing needs in Hullbridge identifies the following need for affordable housing:
- Social/Affordable rented homes (140 units):
 - 1 bed – (70 units), 2 bed – (48 units), 3 bed – (31 units), 4 bed – (1 unit)
 - Intermediate homes (35 units):
 - 1 bed – (11 units), 2 bed – (11 units), 3 bed – (12 units), 4 bed – (1 unit)
 - We would recommend a further review of property types on site commencement as the above figures can change significantly over time. Any affordable housing provision should be included in a S106 agreement (which should include delivery triggers, nomination rights and other relevant matters). The Nomination Agreement needs to be in place with the developers preferred Registered Provider (Housing Association). The agreement should stipulate that the Council receives 100% of all initial nominations and at least 75% of nominations thereafter.

Natural England

- 3.144 Advise that further information is required in order for the Council, as the competent authority under the Habitats Regulations, to conclude that the proposed development is unlikely to have a significant effect on the Crouch and Roach Estuaries Special Protection Area (SPA) and Ramsar (internationally important wetland) site, and the Essex Estuaries Special Area of Conservation (SAC).

Internationally and nationally designated sites

- 3.145 The application site is within or in close proximity to a European designated site (also commonly referred to as Natura 2000 sites), and therefore has the potential to affect its interest features. European sites are afforded protection under the Conservation of Habitats and Species Regulations 2010, as amended (The Habitats Regulations) The application site is in close proximity to the Crouch and Roach Estuaries Special Protection Area (SPA) which is a European site (which forms part of the Essex Estuaries Special Area of Conservation (SAC)). The site is also listed as the Crouch and Roach Estuaries Ramsar site¹ and also notified at a national level as the Crouch and Roach Estuaries Site of Special Scientific Interest (SSSI).
- 3.146 In considering the European site interest, Natural England advises that you, as a competent authority under the provisions of the Habitats Regulations, should have regard for any potential impacts that a plan or project may have. The Conservation objectives for each European site explain how the site should be restored and/or maintained and may be helpful in assessing what, if any, potential impacts a plan or project may have.

Further information required

- 3.147 The consultation documents provided by your authority do not include information to demonstrate that the requirements of Regulations 61 and 62 of the Habitats Regulations have been considered by your authority, i.e. the consultation does not include a Habitats Regulations Assessment.
- 3.148 In advising your authority on the requirements relating to Habitats Regulations Assessment (HRA), and to assist you in screening for the likelihood of significant effects, based on the information provided, Natural England offers the following advice:-
- the proposal is not necessary for the management of the European site;
 - that the proposal is likely to have a significant effect on the Crouch and Roach Estuary SPA, and Ramsar site;
 - that therefore your authority should not grant planning permission at this stage. An Appropriate Assessment should now be undertaken, in order to assess the implications of the proposal for the European site(s), in view of the site conservation objectives. Natural England is a statutory consultee at the Appropriate Assessment stage of the Habitats Regulations Assessment process. The following advice is provided to support the conclusions drawn and to assist your authority to undertake an Appropriate Assessment.

When recording your HRA we recommend you refer to the following information to justify your conclusions regarding the likelihood of significant effects:

- the proposal is likely to generate recreational disturbance to the over-wintering birds of the SPA and Ramsar site. The proposal may also

generate disturbance impacts (such as noise, lighting, etc.) from within the site.

Scope of the Appropriate Assessment

Natural England advises that the Appropriate Assessment should consider at least the following areas (this list is not exhaustive):

- the number of SPA birds in the area affected;
- the area of the SPA affected by disturbance;
- the increase in frequency of disturbance, under the three scenarios discussed below;
- the impact of disturbance on different species (i.e. tolerance levels);
- the relative impact of disturbance on foraging and roosting behaviour;
- the impact of different types of disturbance (e.g. walker, dog walker, jogger etc.); and
- the importance of this part of the estuary during severe winter weather.

- 3.149 The Council should consider whether it has sufficient information to undertake the AA (in our view there is not enough information), and request any additional information from the applicant.
- 3.150 Natural England has reviewed all the ecological information in support of this planning application. We have been unable to find information in relation to a HRA. The Biodiversity Survey (JR Consultancy Services Ltd, dated October 2014, revision B) correctly identifies the presence of the SPA within 470m of the development boundary (Table 2 + Figure 2). Critically there is no further assessment of potential impacts on the SPA (e.g. increased disturbance or impacts on arable fields which support the bird assemblages outside the SPA) nor appropriate avoidance/mitigation measures to avoid harm. The SPA qualifying species are hen harrier (*Circus cyaneus*) and dark-bellied brent goose (*Branta bernicla bernicla*).
- 3.151 Through the Joint Nature Conservation Committee (JNCC) citation for the SPA it is noted that the site is vulnerable to disturbance of feeding and roosting waterfowl through recreational use of the sea wall footpaths by dog walkers, bird watchers etc. The proposed development will increase these pressures through the recreational needs of an additional 1200 new residents (based on an occupancy of 2.4 per dwelling).
- 3.152 On the opposite side of the estuary to the north-west, Hayes Leisure Park (in Chelmsford City Borough) applied for extended winter occupancy of caravans (14/00722/FUL). Given its close proximity, the HRA for the Hullbridge proposals must take account of cumulative impacts.

Potential Impacts on mobile species outside the SPA

- 3.153 Special Protection Areas (SPAs) are classified for rare and vulnerable birds and for regularly occurring migratory species. The birds for which SPAs are designated may also rely on areas outside of the SPA boundary (e.g. brent geese using adjoining arable fields). These supporting habitats may be used

by SPA populations or some individuals of the population for some or all of the time. These supporting habitats can play an essential role in maintaining SPA bird populations, and proposals affecting them may therefore have the potential to affect the SPA.

- 3.154 It should be noted that some of the potential impacts that may arise from the proposal relate to the presence of SPA interest features that are located outside the site boundary. It is advised that the potential for offsite impacts needs to be considered in assessing what, if any, potential impacts the proposal may have on European sites.

Site of Special Scientific Interest

- 3.155 This application is also in close proximity to the Crouch and Roach Estuaries Site of Special Scientific Interest (SSSI). However the interest features of the SPA (over-wintering birds) are similar to those of the SSSI referred to above, and therefore the comments made above also apply to the SSSI. There are other interest features of the SSSI (e.g. aquatic and terrestrial invertebrates and an outstanding assemblage of nationally scarce plants), however we do not believe that these will be affected by the proposal.

Other advice

- 3.156 We would expect the Local Planning Authority (LPA) to assess the following when determining this application:-
- local sites (biodiversity and geodiversity)
 - local landscape character
 - local or national biodiversity priority habitats and species.

Natural England does not hold locally specific information relating to the above. These remain material considerations in the determination of this planning application and we recommend that you seek further information from the appropriate bodies (which may include the local records centre, your local wildlife trust, local geo-conservation group or other recording society and a local landscape characterisation document) in order to ensure the LPA has sufficient information to fully understand the impact of the proposal before it determines the application

Protected Species

We have not assessed this application and associated documents for impacts on protected species. Natural England has published Standing Advice on protected species. The Standing Advice includes a habitat decision tree which provides advice to planners on deciding if there is a reasonable likelihood of protected species being present. It also provides detailed advice on the protected species most often affected by development, including flow charts for individual species to enable an assessment to be made of a protected species survey and mitigation strategy.

You should apply our Standing Advice to this application as it is a material consideration in the determination of applications in the same way as any individual response received from Natural England following consultation.

The Standing Advice should not be treated as giving any indication or providing any assurance in respect of European Protected Species (EPS) that the proposed development is unlikely to affect the EPS present on the site; nor should it be interpreted as meaning that Natural England has reached any views as to whether a licence may be granted.

Biodiversity enhancements

This application may provide opportunities to incorporate features into the design which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes. The authority should consider securing measures to enhance the biodiversity of the site from the applicant, if it is minded to grant permission for this application. This is in accordance with Paragraph 118 of the NPPF. Additionally, we would draw your attention to Section 40 of the Natural Environment and Rural Communities Act (2006) which states that “Every public authority *must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity*” Section 40(3) of the same Act also states that “conserving biodiversity includes , in relation to a living organism or type of habitat, restoring or enhancing a popular habitat”.

National Grid

Advise that National Grid have apparatus in the vicinity of the site which may be affected by the proposal and request notification of the Council's decision on the development.

The apparatus identified is:-

- High or Intermediate pressure (above 2 bar) Gas Pipeline and associated equipment.
- Low or Medium pressure (below 2 bar) Gas Pipes and associated equipment. As a result it is highly likely that there are gas services and associated apparatus in the vicinity)

The contractor should contact National Grid before any works are carried out to ensure the apparatus is not affected by the proposed works.

Sport England

- 3.157 An objection is made to the application in its current form due to the lack of clarity about how provision will be made for meeting the additional needs generated for community outdoor and indoor sports facility provision. This position would be reviewed once it has been confirmed how such provision should be made. The response provides details of the issues that would need to be considered to inform a decision about whether on-site or off-site outdoor sports provision should

be made and advocates that indoor sports provision is made through securing financial contributions.

- 3.158 Sport England has assessed the application against its adopted planning policy objectives. The focus of these objectives is that a planned approach to the provision of facilities and opportunities for sport is necessary in order to meet the needs of local communities. The occupiers of any new development, especially residential, will generate demand for sporting provision. The existing provision within an area may not be able to accommodate this increased demand without exacerbating existing and/or predicted future deficiencies. Therefore, Sport England considers that new developments should be required to contribute towards meeting the demand they generate through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision should be informed by a robust evidence base such as an up to date Sports Facility Strategy, Playing Pitch Strategy or other relevant needs assessment.
- 3.159 The planning application is an outline planning application for a residential urban extension to the west of Hullbridge and covers the SER6 allocation in the Council's adopted Allocations Plan. It is proposed that the development would accommodate 500 dwellings. The application plans show a proposed area of public open space to the north west of the site that could potentially accommodate sports pitches. In this context, I would wish to make the following comments on particular sport related aspects of the planning application.
- 3.160 The development proposes an unquantified area of public open space to the north west of the application site. Paragraph 6.20 of the Planning Statement proposes that the open space could include youth and junior sports pitches although this is not confirmed at this stage as the matter is the subject of ongoing discussions with Rochford District Council (RDC).
- 3.161 In terms of assessing the adequacy of outdoor sports provision proposed in major new residential development, in accordance with Government policy (paragraph 73 of the NPPF) it is expected that new provision to meet the needs generated by such development should be based on robust and up-to-date assessment of needs. Such assessments would usually incorporate quantitative standards of provision or alternative approaches to calculating provision which would inform the scale of provision required to be made by new development.
- 3.162 While RDC has prepared a Playing Pitch Strategy (2012) SPD which forms part of the local development framework this does not include standards or alternative proposals for how new residential development should make provision. However, policy SER6 of the Allocations DPD advises that a

minimum of 0.02 hectares of youth facilities should be provided on this site although the type would be determined in consultation with RDC at the planning application stage. Policy SER6 also advises that the provision of leisure facilities should be determined with the Council at the planning application stage. RDC's Playing Pitch Strategy concluded that additional junior and mini football pitches are required in Hullbridge to meet current and future needs as well as a rugby pitch.

- 3.163 If it was decided through this planning application that the proposed public open space was to be used for junior or mini football pitches, this would in principle be a positive response to the playing pitch strategy recommendations. However, the following issues need to be considered and addressed before a decision is made:

Local football needs:

- 3.164 While the proposals for providing a playing field suitable for junior/mini football pitches may respond to the general findings of RDC's playing pitch strategy, consideration needs to be given to whether the pitches will be suitable for meeting the needs of the expected users of the pitches in practice. Consultation should therefore take place with football clubs in Hullbridge and the Essex County FA to ensure that providing a new playing field with mini/junior pitches within the development would actually be responsive to meeting the needs of the clubs. In particular, consideration will need to be given to whether the proposed open space will be of a suitable size and shape for accommodating the range of football pitch sizes that would meet the current and future needs of local clubs. In this regard, consideration should be given to whether the recommended range of football pitch sizes for mini and junior in the Football Association's technical guidance could be accommodated on the site.

Suitability of the Public Open Space for Formal Playing Pitch Use:

- 3.165 If the proposed open space is to be used for formal playing pitch use (i.e. used by local football clubs for matches/training) it will need to be planned and designed as a formal playing field from the outset and will need to be supported by appropriate ancillary facilities. The open space would need to be prepared to a standard that allows competitive football match play (i.e. would need to be levelled and pitch drainage installed). This would have greater technical and cost implications than an open space that is just designed for informal football use by residents of the development. A small ancillary building would also be needed to provide changing/toilet and refreshment facilities for users of the football pitches plus for storage of equipment (e.g. goal posts) and pitch maintenance equipment. Car parking and a suitable vehicular access point would also be needed to avoid users of the playing field parking in the adjoining residential areas and generating residential

amenity conflicts during peak periods of formal use of the playing field (e.g. Sunday mornings). It should be noted that a large proportion of the users of a playing field would be expected to travel by car if the open space was used for formal sport (e.g. away teams, officials). While the master plan is only indicative at this stage, it does not indicate that dedicated car parking or vehicular access would be included. Provision would also need to be made through the planning application for covering the costs of the long term maintenance of the pitches and ancillary facilities to the required standards.

- 3.166 Following consideration of these matters, it may be decided that the proposed open space would be unsuitable for formal sports pitch use and that instead the area should just be used for informal sport. If this is the case, off-site provision for formal outdoor sport should be made in the form of a financial contribution being secured through a section 106 agreement towards the provision or enhancement of local playing field projects that would help address local needs. Such projects should be identified in consultation with RDC and other local stakeholders including Hullbridge Parish Council, local sports clubs and sports governing bodies (such as the Essex County FA). It is considered essential that the development makes provision for meeting local outdoor sports needs either on-site or off-site (through developer contributions) due to the identified need for additional playing pitch provision in Hullbridge. If the application was permitted without provision being made for formal outdoor sport, there would be a concern that this would place pressures on existing local facilities which the Council's strategy indicates are already at capacity. This is pertinent in view of this proposal being the largest planned residential development in the Hullbridge area.
- 3.167 As it has not been confirmed at this stage whether the proposed public open space would be planned and designed for formal outdoor sport, and if not, how provision would be made for meeting the additional needs generated by the development, at this stage, Sport England's position would be an objection to the planning application. I would be prepared to review this position once it has been confirmed how provision for outdoor sport would be made. It is advocated that Sport England is engaged for advice before any decisions are made.
- 3.168 In the event that it is proposed that the public open space is to be used for formal playing pitch use, there will be a need for a range of matters to be addressed at reserved matter stage to ensure that a fit for purpose playing field is provided in practice. If applicable, and without prejudice to our general position on this matter set out above, the following matters should be addressed through a section 106 agreement or planning conditions if outline planning permission is forthcoming:

Playing Pitch Layout:

- 3.169 Provision for the submission and approval of a proposed playing pitch layout to assess the suitability of the pitches that would be provided;

Ancillary Facilities:

- 3.170 Provision for the submission and approval of the details of the ancillary facilities (changing/storage building, parking, vehicular access) that would support the use of the playing field for formal sport.

- 3.171 Playing Field Quality:

- 3.172 The submission and approval of a ground conditions assessment to assess the ground conditions of the area proposed for public open space in order to identify the issues and constraints that would need to be addressed. A related sports pitch specification will need to be prepared based on the assessment which will set out how the site will be prepared and designed for playing pitch use. Sport England's guidance note "Natural Turf for Sport" (2011) provides detailed advice on what should be included in a site feasibility study, and how new playing pitch sites can be planned, designed, managed and maintained to maximise their quality. This document can be downloaded from Sport England's website at www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/natural-turf-for-sport/. I would expect the design of the playing pitches, in terms of dimensions, orientation, drainage measures etc. to accord with "Natural Turf for Sport" in order to ensure that high quality outdoor sports facilities are provided.

Playing Field Management & Maintenance:

- 3.173 It will be important to secure arrangements for the future maintenance of the playing field and its long-term management/tenure through a section 106 agreement.

Phasing:

- 3.174 It will be essential that the details of the phasing of the proposed public open space in relation to the wider residential development are submitted and approved in order to assess the acceptability of the proposals for the delivery of community infrastructure to support the residential development which includes a potential playing field. Sport England would expect the new playing field to be phased appropriately to allow it to be available before the majority of new residents move into the proposed development in order to avoid pressures being placed on existing nearby facilities which may already be at capacity.
- 3.175 Sport England has developed a schedule of model planning conditions for local authorities to use which are on our website at www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/. Conditions 9, 10a and 11 should be used

for addressing the details required above for ancillary facilities and playing field quality. If it is decided that the public open space will be used for formal playing pitches, Sport England would object unless the above matters were satisfactorily addressed as requested in order to ensure that fit for purpose outdoor sports facilities are provided in practice which is necessary to ensure that the additional needs generated by the residential development are met.

Indoor Sports Facility Provision

- 3.176 A residential development of up to 500 dwellings will create significant additional demand for community indoor sports facilities such as sports halls, swimming pools, health & fitness centres etc. No on-site provision is proposed and no reference is made in the planning application to such provision although it is noted that leisure facility provision is a matter which will be considered through this planning application in consultation with DC and the local community.
- 3.177 If the development did not make any provision for indoor sports facilities, it would place pressure on existing facilities. The policy context for the development to make provision for the indoor community sports facilities that it generates is set out in Policy CLT1 (Planning Obligations and Standard Charges) of the RDC Core Strategy which refers to the Council applying standard charges to development to secure financial contributions and as set out in Appendix CLT1, standard charges from residential developments are to be used to help secure expansions to leisure centres.
- 3.178 Sport England's Sports Facility Calculator is an established strategic planning tool which provides an estimate of the demand for community sports facilities for any given population, based on the local population profile. Demand is expressed in terms of swimming pools, sports halls etc. and in terms of the cost of providing the facility (allowing for regional variations in building costs). This tool can estimate how much additional demand for sports facilities a new housing development will generate and quantify the contribution (at current prices) that should be sought from developers. As an estimate, based on an increase in the residential population of 1,250 people (based on 500 dwellings with a household occupancy of 2.5 persons per dwelling), the residential population of the proposed development is estimated to generate a need equivalent to 6% of a 25m swimming pool, 8% of a four court sports hall and 2% of an indoor bowls centre. The current cost of providing these facilities (at April 2014) would in total be £448,776. If the local planning authority or applicant wished to perform their own calculation or find out more about the Sports Facility Calculator, it can be downloaded from our website at <http://www.sportengland.org/facilities-planning/planning-for-sport/planning->

tools-and-guidance/sports-facility-calculator/ . Alternatively, I would be happy to provide further advice in this regard.

- 3.179 As indoor sports facilities are strategic facilities, it is not considered appropriate to provide indoor sports facilities on-site as part of this development as it would not be large enough to justify provision in this form. Instead, Sport England would expect a financial contribution to be secured through a section 106 agreement, which would be used towards providing new, or improving existing, facilities within the local area. Such projects should be informed by discussions with Rochford District Council and other local stakeholders.
- 3.180 As no proposals have been made at this stage for meeting the development's indoor sports facility needs, objection is therefore made to the planning application in its current form. However, I would be willing to withdraw this objection if it is confirmed that an appropriate financial contribution towards the provision or enhancement of off-site indoor sports facilities will be made in practice.

London Southend Airport

- 3.181 No safeguarding objections. Advise that any landscaping / lighting scheme to be CAP 168 compliant. Any crane or piling rig will need to be safeguarded separately.

Neighbour representations

- 3.182 A detailed summary of the responses received is set out at Appendix 1 to this report.
- 3.183 A petition of 213 signatures and 1127 individual responses have been received objecting to the proposal.

4 MATERIAL PLANNING CONSIDERATIONS

Principle of residential development

- 4.1 The proposal for residential development has to be assessed against relevant planning policy and with regard to any other material planning considerations. In determining this application regard must be had to section 38(6) of the Planning and Compulsory Purchase Act 2004, which requires proposals to be determined in accordance with the development plan unless material considerations indicate otherwise.
- 4.2 The former East of England Plan required a minimum of 4600 dwellings to be provided in the District between 2001 and 2021. In addition the council was required to plan for housing delivery for at least fifteen years from the date of the adoption of the Core Strategy. This has assumed an annual requirement

of 250 completions up to 2025 working forward from the adoption of the Council's Core Strategy in December 2011.

- 4.3 Paragraph 47 to The National Planning Policy Framework requires Local Planning Authorities to use their evidence base to ensure that local plans meet the full objectively assessed needs for market and affordable housing and to identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements. Where there has been a record of persistent under delivery of housing a further buffer of 20% of dwellings required must be moved forward from later in the plan period in order to provide a realistic prospect of achieving the planned supply. Although the Former East of England Plan has been abolished, its evidence base provides a sound assessment of housing need for the area.
- 4.4 The adopted Development Plan for the area in which the site is located comprises the Rochford District Council Local Development Framework Core Strategy adopted December 2011, the Rochford District Council Local Development Framework Allocations Plan adopted February 2014 and the Rochford District Council Local Development Framework Development Management Plan adopted in December 2014.
- 4.5 The application site is within the general location of South West Hullbridge referred to in Policy H2 and Policy H3 of the Core Strategy as one of the general locations in the District where land would be released from the Green Belt to meet a rolling up-to-date five year supply of deliverable sites for residential development up to 2021 and also post 2021. This general location was identified in Core Strategy Policy H1 to accommodate 250 dwellings between 2015 and 2021 and by Core Strategy Policy H3 to provide a further 250 dwellings post 2021. The Allocations Plan which has subsequently been adopted, identified a specific site within this general location known as SER6 but which is subdivided further whereby that south and eastern part of the site identified as SER6a would be developable prior to 2021 with that northern and western part of the site shown in the Allocations Document as SER6b would be developable after 2021 unless required earlier in order to maintain a five year supply of housing land.
- 4.6 Following extensive community involvement, appraisal and evidence gathering, the Council's agreed Core Strategy was submitted to the Government for examination in January 2010 to determine whether the strategy was 'sound' and 'legally compliant'. The Core Strategy has been found 'sound' and 'legally compliant' by the Planning Inspectorate and was formally adopted by the Council on 13th December 2011.

- 4.7 The Allocations Plan was formally adopted following confirmation from the Planning Inspector conducting the examination that the Plan was sound and legally compliant. The Allocations Plan allocates specific sites and sets out detailed policies for a range of uses, including residential, employment, education and open spaces, and has been prepared in accordance with the general locations and policies set out in the adopted Rochford Core Strategy to accommodate the current housing and other development needs in the District.
- 4.8 A legal challenge to the adoption of the Allocations Plan was made to the High Court on 4 April 2014 under Section 113 of the Planning and Compulsory Purchase Act 2004 on grounds that the document was not within the appropriate powers and/or a procedural requirement had not been complied with. Several hearing sessions took place and the claim was dismissed by the High Court in a decision issued in December 2014. The Allocations Plan therefore proceeds as adopted.
- 4.9 The application site is consistent with the sites identified in the Allocations Plan under SER6a and SER6b. Following the adoption of the Allocations Plan in February 2014 the land designated as SER6a and SER6b is no longer subject to the former Green Belt designation. The principle of the proposed residential development is therefore accepted, in accordance with Policy SER6.
- 4.10 Both the preparation of the Core Strategy and the Allocations Plan were the subject of public consultation and consultation with statutory consultees which have informed the plan making process.
- 4.11 Whilst a number of objections have been received from members of the public concerning the lack of suitability for residential development at this site it is considered that objections carry little weight as the principle of residential development of this site has a clear policy context. The policy support for the site as one of the preferred sites to contribute to the districts identified housing supply following public consultation and rigorous scrutiny by an Inspector at the Examination In Public.

Quantum of Residential Development

- 4.12 The application details describe the proposed development to equate to approximately 500 dwellings. The submitted Concept Master Plan identifies the areas of the site where residential development would take place together with an indicative arrangement showing key frontages onto the main access corridors and division within the layout of some 26 different areas.
- 4.13 The design and access statement accompanying the application envisages the high density development to contain a mixture of terraced, semi- detached

house types and apartment buildings at a maximum three storeys in height and to a density of 45 dwellings per hectare. This area is shown to the middle part of the site occupied at present by and south east of the existing group of farm buildings.

- 4.14 The design and access statement accompanying the application envisages the low density development to contain detached and semi- detached housing at a maximum of two storeys in height and to a density of 25 dwellings per hectare. This area is indicated to front Windermere Avenue to the north of the site.
- 4.15 The remainder of the residential parcels are envisaged to be medium density to contain semi- detached and terraced housing at a maximum of three storeys and to a density of 35 dwellings per hectare.
- 4.16 The Council's allocations document anticipates the development of the site at an average density of 30 dwellings per hectare. The extent of the site allocated for the development equates to 23.4 hectares to account for constraints, infrastructure, services and facilities. At 23.4ha the land would otherwise provide for a nominal 702 units. The application details calculate the total area to be given over to actual residential use would equate to 14.3ha. This equates to an average density of 35 units per hectare but ignores that part of the total area that would be required for highways and other land uses such as the landscaping and public open space areas.
- 4.17 The more precise layout and consideration of the density would be considered at the Reserved Matters stage following the grant of outline permission. As only the principle of the development falls to be considered at this outline stage it is clear from the plans submitted that the site is able to accommodate the number of dwellings allocated in the Council's allocations document. This total area of land would be sufficient to accommodate the 500 dwellings allocated including capacity to accommodate all the necessary detailed layout requirements such as parking bays to the preferred bay size and minimum garden areas.
- 4.18 As the application site does not include all of the land within the SER6b allocation there is potential for other planning applications to come forward on the remaining parts of the allocation comprising the pumping station to the south west corner of the site and the area of land to the north west corner of the site fronting Windermere Avenue which have the potential to result in proposals which would cumulatively result in more than the 500 dwellings on the allocated land as a whole. Any subsequent applications would have to be determined at a future date on planning merit. Policy SER6 does however allow for a degree of flexibility in the quantum of dwellings the allocated site could accommodate providing that the need for any additional dwellings to

maintain a five-year land supply can be demonstrated and any additional dwellings be shown to compensate for a shortfall of dwellings predicted to be delivered within the location identified in the adopted Core Strategy.

- 4.19 The submitted density and building height parameters plan shows proposed variation in density across the site. It would not be imperative that the detailed plans worked up at the Reserved Matters stage adhered rigidly to these density bands, however some variation in density across the wider site would be needed to ensure that in design terms the whole site did not appear homogenous and this would be secured by the suggested planning condition relating to density and character areas. Variation of other factors such as architectural detailing, house type, external facing materials and layout will also add to the creation of place and provide opportunity for variation across the site.
- 4.20 The current proposal for some 500 dwellings on the application site would accord with Policy SER6 and the total area of land shown designated for residential development on the Concept Master Plan could accommodate the proposed quantum whilst meeting necessary detailed layout requirements. The proposed quantum of development, namely some 500 dwellings could not therefore be reasonably be resisted. The reserved matters should however be the subject of a design brief in order to ensure the provision of character areas and place making within the overall development. These can be achieved as requirements of conditions to the grant of outline permission.

Infrastructure provision

- 4.21 Appendix H1 to Policy H2 to the Core Strategy and Policy SER6 to the Allocations plan prescribe the infrastructure requirements which must be delivered by this site in order to ensure that the new residential development is comprehensively planned; these are as follows:-
- Local highway capacity and infrastructure improvements, including improvements to Watery Lane and Watery Lane / Hullbridge Road junction;
 - Public transport infrastructure improvements and service enhancements;
 - Link and enhancements to local pedestrian/cycling and bridleway network;
 - Sustainable Drainage systems;
 - Public Open Space;
 - Play Space;
 - Youth facilities and community facilities;
 - Leisure facilities and

- Link to cycle network.

Local highway capacity and infrastructure improvements, including improvements to Watery Lane and Watery Lane / Hullbridge Road junction

- 4.22 Paragraph 3.183 to the concept statement set out in the adopted allocations document requires the development proposed to provide improvements to Watery Lane and Watery Lane / Watery Lane Hullbridge Road / Lower Road junctions. Those improvements it is argued should include the raising of the highway and improved drainage maintenance.
- 4.23 The applicant proposes to provide a mini - roundabout at the junction between Watery Lane and Hullbridge Road / Lower Road and the enhancement of the junction made between Hambro Hill, Hullbridge Road and Rawreth Lane by widening the Hambro Hill carriageway approach in front of Hambro Parade. The analysis contained in the accompanying transport assessment shows that traffic from the development proposed would generate 228 two way vehicle movements in the morning peak and 261 two way vehicle movements in the evening peak. The Ferry Road and Rawreth Lane / Hullbridge Road junctions experience queuing at these times although note is made that the bus stop near to the Ferry Road junction influences this and that traffic more quickly disperses once the bus moves on. The amendments to the junctions demonstrated in the application details would address the impact upon those junctions arising from the additional flows generated by the development proposed.
- 4.24 Essex County Council (ECC) as Highway Authority comprehensively assessed all the submitted material supporting the aforementioned planning application for 500 residential units to the land north of Lower road, Hullbridge, within the SER6a and SER6b allocation sites. Cannon Consulting Engineers (CCE) were appointed to carry out a transport assessment on behalf of Southern and Regional Developments Ltd. and following a scoping meeting with ECC the format of the Transport Assessment was agreed. A subsequent technical note was produced by CCE and agreed by ECC on trip generation, trip rates, growth and distribution of the traffic. This includes the proposed growth from other development in the Rochford area.
- 4.25 The following junctions were agreed for assessment:-
- Site access
 - Lower Road / Ferry Road / Coventry Hill
 - Lower Road / Watery Lane
 - Rawreth Lane / Hullbridge Road

It was agreed with the developer to identify a series of measures that could also alleviate congestion and queuing along the Hullbridge / Rawreth Lane Corridor to mitigate the impact of the proposed development in line with the tests set out in the NPPF. Following further assessment including camera monitoring and on site observations a package of measures was developed:-

- Provision of a new roundabout at the junction of Rawreth Lane / Hullbridge lane
- Introducing ghost right hand turn lane and improved signage at the watery lane junction

The junction modelling has shown the traffic generated by the development will impact on the junction assessed but with the proposed mitigation above in place the impact will be reduced to provide for nil detriment or in some cases improvement.

- 4.26 In order to reduce the number of trips made by car from the development and in line with Sustainable Transport policy a residential travel plan would assist the encouragement of walking, cycling and public transport given the sites close proximity to local services and good bus service.
- 4.27 The traffic impact has been assessed and mitigation proposed in accordance with the scale of development and Policy requirements therefore from a highway and transportation perspective the impact of the proposal is acceptable to the Highway Authority subject to the mitigation and conditions set out in the report.
- 4.28 The robust Transport Assessment focused on the network in the vicinity of the site including Lower Road, Hullbridge Road, Watery Lane and Rawreth Lane. The analysis concluded that the junction operations would meet the tests set out in NPPF. The means of access to the development shall be from roundabout on Lower Road.
- 4.29 The County Highway Authority do not favour the strategic use of Watery Lane. Instead the County Highway Authority favour the Rawreth Lane / Hullbridge Road route to disperse traffic flows and access services. As such the County Council does not encourage the proposed mini – roundabout at the Watery Lane and Hullbridge Road / Lower Road junction and instead favour the provision of right turn ghost lanes to be provided at the junction together with enhancement to signage to this junction. The applicants have agreed in principle to these alterations. This would need to be a matter required by a legal agreement between the Council, the County Highway Authority and the Applicants as part of the granting of permission.

- 4.30 Following consideration by the County Highway Authority as a result of the findings of camera monitoring and on site observations a package of measures has been developed to provide a new roundabout at the junction of Hambro Hill / Hullbridge Road with Rawreth Lane and is the subject of a separate application and report considered under application reference 16/00162/FUL. This roundabout is considered by the County Highway Authority to provide nil detriment and improvement to traffic conditions to the Rawreth Lane / Hullbridge Road corridor over and above that attributed to the development to which this application relates. The applicants agree in principle to fund the acquisition of the land and the construction of this roundabout in accord with the recommendations of the County Highway Authority as an alternative to the proposed alterations to the existing junction in front of Hambro Parade that mitigate the effects of this application. This would need to be a matter required by a legal agreement between the Council, the County Highway Authority, the Applicants and land owners as part of the granting of outline permission.
- 4.31 The development as proposed would include highway improvements to address the increased capacity required to mitigate the impact of the development proposed but can as an alternative deliver the new roundabout at the junction of Rawreth Lane with Hullbridge Road. Either alternative schemes address the requirements for Local highway capacity and infrastructure improvements to Watery Lane and Watery Lane / Hullbridge Road junction required by Policy H2 to the Council's adopted Core Strategy and Policy SER 6 to the Councils allocations plan.

Public transport infrastructure improvements and service enhancements

- 4.32 The site has good access to a regular bus service connecting Hullbridge with Rayleigh and Southend. The County Highway Authority do not seek the subsidising of the existing service or improvements to bus stop facilities but instead agree the conclusions of the applicants transport consultant engineers and the need for a residential travel plan and travel pack to provide for six one day travel vouchers for each resident to the development proposed. The County Highway Authority seek a £3,000 monitoring fee and as such this matter would need to be included in a legal agreement between the Council, the County Highway Authority and the Applicants as part of the granting of permission.

Link and enhancements to local pedestrian/cycling and bridleway network

- 4.33 The Concept Masterplan accommodates the connectivity between the proposed development and the existing settlement as shown on the Access

and Movement Parameter Plan. Whilst vehicular access would be obtained from Lower Road and from Malyons Lane, the indicative layout shows intended pedestrian and cycle permeability at further access points into The Priors to the south east and Harrison Gardens and Windermere Avenue to the north. The Concept Masterplan shows the arrangement of the site in blocks that would allow freedom of movement within the development by cycle and pedestrians.

- 4.34 The existing Public footpath 7 that crosses through the site from Malyons Lane to Public Footpath 2 further west would be retained in the indicative layout shown.
- 4.35 There are no bridleways in the vicinity of the site. The County Highway Authority has not sought monies for wider improvement to either the cycle or bridleway network. The improvement of local traffic conditions that would be brought about by the roundabout junction improvement to Hambro Hill / Hullbridge Road with Rawreth Lane would however provide some indirect benefit to improved capacity on the local network that may improve conditions for cycling and horse riding on the highway.
- 4.36 A planning condition to the grant of permission would allow provision to be made in the future detailed layout of the site for the provision of an on – site bridle path and on site cycle path in the open space(s) to be provided on the site.

Sustainable Drainage systems

- 4.37 The site falls within flood zone 1 and the area of least risk to which development such as proposed should be directed. The assessment further identifies that part of the site to the south west corner of the site in the vicinity of Watery Lane below the 7m contour to be at various risks from surface water flooding. The Concept Master plan shows the provision of public open space to this part of the site with the residential area generally outside of that. That public open space is shown to provide below ground storage. The man estate road is shown to be adjoined by a swale with two areas of flood attenuation basins. The matter of drainage is considered more fully later in this report but the Concept Masterplan demonstrates that sustainable drainage would feature as part of the overall development of the site as required by Policy H2 to the Council's adopted Core Strategy and Policy SER 6 to the Councils allocations plan.

Public open space

- 4.38 Paragraph 3.172 to the concept statement to the adopted allocations document requires the development proposed to provide a minimum of 3.6ha of publicly accessible natural / semi – natural green space. The Concept

Masterplan shows the provision of 6.2ha of open space providing landscaped edges incorporating drainage attenuation ponds to the southern and western edges together with a buffer to part of the eastern edge of the development with the existing settlement. Paragraph 3.173 to the concept statement seeks to enhance that provision by ensuring the provision of trees in appropriate landscape and garden settings. A condition to the grant of the outline permission would ensure the requirement is met at the detailed stage. The master plan does however show that the quantum of development can be accommodated on the site without compromising the required open space.

Play Space

- 4.39 Paragraph 3.174 to the concept statement set out in the adopted allocations document requires the development proposed to provide a minimum of 0.6ha of play space. The Concept Masterplan shows the provision of two Local Areas for Play (LAP) to the southern entrance area and northern end off Harrison Gardens. In addition one Neighbourhood Equipped Area for Play to the central part of the site off Malyons Lane. The Concept Masterplan shows that the quantum of development can be accommodated on the site without compromising the required play space. A condition would be required to the outline permission to ensure the requirement is met at the detailed stage.

Youth facilities and community facilities

Paragraph 3.176 to the concept statement set out in the adopted allocations document requires youth and community facilities to accompany the development and to be integrated with any phasing together with the existing residential development to the east of the site so that such facilities would be accessible by the local community. However the concept statement goes on to state that off site facilities may be appropriate. Paragraph 3.178 to the concept statement states that whilst such facilities could take the form of indoor or outdoor provision, a minimum of 0.02ha for outdoor youth facilities should be provided. The type of facilities should be determined in consultation with young people at the planning application stage with reference to guidance produced by the fields trust. There is potential revealed through the applicants pre –application consultation with the community to provide a skate park on the site and this can be a requirement of a legal agreement to accompany the grant of outline permission.

Leisure facilities

Paragraph 3.179 to the concept statement set out in the adopted allocations document requires that the provision of leisure facilities should be determined in consultation with the Council at the planning application stage. There are no committed or planned projects at present that the scheme could

reasonably contribute to at this stage. The provision of additional playing pitches for its own sake would appear unreasonable given the practical surplus and under utilisation in the district.

Small scale A1 units

- 4.40 Paragraph 3.181 to the concept statement set out in the adopted allocations document requires exploration of the provision of additional small scale shopping units to be explored at the planning application stage.
- 4.41 The applicants identify that the existing settlement of Hullbridge has a good range of local service and convenience stores. The applicant has considered the key findings of the Council's retail Health Study (2008) which amongst other things, identified a level of under- trading in convenience goods for the settlement of Hullbridge suggesting one of the three main convenience stores could be under threat. The applicants do not therefore propose further retail provision so that the quantum of development proposed will support the existing provision and help ensure sufficient demand to keep those existing shops and services viable. This also increases the potential funding available to provide the roundabout junction at Rawreth Lane and Hullbridge Road.

Health care

- 4.42 Paragraph 3.192 to the concept statement set out in the adopted allocations document requires that a Health Impact Assessment be undertaken and accompany any planning application. Actions to address any negative impacts identified by the assessment must accompany the site or be provided prior to the commencement of the development. NHS England have been consulted on the proposal which includes and have identified the need for a financial contribution of £164, 560 (calculated by NHS England's standard formula based on 500 dwellings) to mitigate the impact that the proposed development would have on primary health care services having regard to the capacity of existing GP practices in the vicinity of the site. This funding can be secured as a requirement of a legal agreement to accompany the grant of outline permission.
- 4.43 Subject to the above s106 requirements the proposed development would not result in increased pressure on existing primary healthcare facilities as satisfactory mitigation would be secured.

Design

- 4.44 Policy CP1 requires new housing developments to achieve high quality design and layout. Good design is that which contributes positively to making places better for people and takes the opportunities available for improving the character and quality of an area and the way it functions. Places exhibiting good design should be visually attractive, safe, accessible, functional,

inclusive, and have their own identity and maintain and improve local character. They should also be well integrated with neighbouring buildings and the local area more generally in terms of scale, density, layout and access and relate well to the surroundings.

- 4.45 At this outline stage the applicant is required to demonstrate how the proposal would integrate with the surrounding context. The applicant has considered this in the submitted Design and Access Statement.
- 4.46 As this is an outline application, detailed design and layout is not a matter for consideration at this stage. The submitted Concept Master Plan does however show how the proposed residentially developable areas would fit with the proposed areas of open space and achieve a high degree of permeability with the existing settlement pattern.
- 4.47 Essex County Council Urban Design Team has provided comments on the outline proposal and are supportive of the two access points but critical of the potential for block format of the layout concept lacking a countryside edge form. It is suggested that a single row of dwellings could back onto existing development on the eastern boundary of the site or to create smaller blocks to integrate better with existing development adjoining the site. Re- routing of the green corridors is also suggested.
- 4.48 The overall design in terms of scale, massing and location would be considered in detail at the Reserved Matters stage. The provision of a design and public realm brief will guide the preparation of the detailed layout achieving a number of distinct character areas and a countryside edge to the resulting settlement pattern. These matters will be the subject of a condition to the grant of outline permission upon which the detailed design can then be based.
- 4.49 Any future Reserved Matters application would be subject to its own consultation and allow for the acceptability of the proposed detailed design, layout and appearance to be interrogated further and for relevant policy relating to details matters of design to be taken into consideration.
- 4.50 Scale, height and massing of the development are themes for consideration in a reserved matters application following the outline consent approval.

Affordable Housing

- 4.51 The application details have been submitted in accord with the Council's Policy H4 of the Core Strategy to provide 35 percent affordable housing in each phase (Reserved Matters application). This requirement would form part of the s106 legal agreement, which would also include clauses to require appropriate delivery triggers, nomination rights, the affordable dwellings to be tenure-blind, reasonably located and to a 80 percent (affordable rent)/20

percent (intermediate) split in accordance with the requirements of the Council's Strategic Housing Departments requirements.

Dwelling Types

- 4.52 Policy H5 of the Core Strategy requires that new housing developments contain a mix of dwelling types to ensure that they cater for and help create mixed communities. As the application is in outline, the precise mix of dwelling types is not yet known and is a matter that would be considered at the Reserved Matters stage. It would be expected that in order to achieve a mixed character development, the necessary design brief would encourage a broad mixture of design and house types to achieve a comprehensive dwelling mix across the whole development and each phase.

New Dwellings – minimum space standards

- 4.53 Policy DM4 requires minimum habitable space standards to be met for all new dwellings. The Government has since the adoption of the Council's minimum habitable space standards, introduced a national space standard as part of the Housing Standards Review (2013) which differs from the standard that Policy DM4 sought to achieve in several respects. The two standards are calculated slightly differently with the national standard proposed to be calculated on Gross Internal Area including voids, stairs and all rooms whereas the local policy standard incorporates only certain 'habitable rooms'. The national space standard also works to a minimum property space standard and also minimum space standards for particular rooms. As the national standard is now in force, future applicants must now adhere to that standard for development in the Rochford District and which will require detailed assessment at the reserved matters stage.

Lifetime Homes/Wheelchair adaptable properties

- 4.54 Policy H6 of the Core Strategy requires all new dwellings to meet the Lifetime Homes Standard which seeks to ensure that homes can be easily adapted to meet the changing needs of homeowners throughout their lifetimes. This policy also requires at least 3 per cent of new dwellings to be built to full wheelchair accessibility standards.
- 4.55 Changes proposed to the Building Regulations, also as part of the Housing Standards Review (2013), propose to enable local authorities to require wheelchair accessible dwellings where this requirement is identified as necessary and set out in a specific local planning policy. Once the proposed wheelchair access changes to the Building Regulations are in force, where a plan has not been formally reviewed, existing policies relating to access should be interpreted by reference to the nearest equivalent optional requirement.

- 4.56 A planning condition is therefore recommended which would require at least 3 per cent of new dwellings to be built to wheelchair accessibility standards as required by Policy H6 until such a time as the proposed access changes to the Building Regulations come into force after which time at least 3 per cent of new dwellings must be built to meet the proposed Building Regulations Category 3b.
- 4.57 Local Authorities will not be able to require that new houses meet other building standards such as Lifetime Homes, once changes to the Building Regulations are in force. Having regard to this, a condition requiring that the development meet the Lifetime Homes Standard (other than in respect of wheelchair accessibility as detailed above) and Code for Sustainable Homes Standard Level 4 (save for in respect of water and energy efficiency as detailed below) is not recommended.

Water and Energy efficiency

- 4.58 Policy ENV9 requires that Code for Sustainable Homes (CfSH) Level 4 be achieved for all new dwellings from 2013. The Government has however proposed the winding down of the CfSH, again as a result of the Government's Housing Standards Review, although provision to ensure measures to achieve minimum water efficiency levels of new dwellings is proposed to be retained, to be incorporated as a new optional requirement in the Building Regulations. This requirement will be available to local authorities where there is a local planning policy which demonstrates a clear local need and would have to be sought as a planning condition.
- 4.59 The proposed optional requirement is to ensure that new dwellings are designed so that their estimated average water consumption would be no more than 110 litres per person per day which is equivalent to Code Level 3. Given this, a planning condition is recommended which would require all new dwellings to achieve Code Level 4 as a minimum until such a time as the proposed changes to the Building Regulations relating to water efficiency are in force after which all new dwellings must achieve water efficiency equivalent to the proposed optional Building Regulations standard as a minimum. Once the changes are in force all new dwellings that are subsequently built would still need to comply with the optional relevant Building Regulations requirement.
- 4.60 Government advice is also that local planning authorities can continue to be able to apply policies requiring development to comply with energy efficiency standards that exceed the energy efficiency requirements of the current Building Regulations until the proposed zero carbon homes policy has been put in place which is anticipated to be towards the end of 2016 and equivalent to Code Level 4. Policy ENV9 currently requires all new dwellings to meet

Code Level 4 as a minimum including in relation to energy efficiency. A planning condition to require this is therefore recommended, consistent with Government advice.

Renewable or low-carbon energy

- 4.61 Policy ENV8 requires developments of 5 or more dwellings to secure at least 10 per cent of their energy from decentralised and renewable or low-carbon sources unless this is not feasible or viable.
- 4.62 A planning condition is recommended to require compliance with the above policy unless it is demonstrated that this would not be viable or unless provision of such would be at the expense of provision of a higher specification energy efficient building fabric (to meet code level 4 with regard to energy efficiency) in which case a report demonstrating the case shall be submitted to and agreed in writing by the Local Planning Authority.

Open Space /Landscaping

- 4.63 At this outline application stage, precise details of the proposed strategic and localised landscaping have not been provided but would be worked up and submitted for consideration at the Reserved Matters stage. A planning condition is also recommended which will ensure delivery of the open space in accordance with an agreed timetable as the residential development progresses. The s106 legal agreement will contain provision to ensure that the open spaces throughout the site are properly maintained.

Drainage / flood risk

- 4.64 The site is located on relatively high ground falling southwards to Hullbridge Road. The site is located within zone 1 as identified by the Environment Agency as the area least susceptible to flooding and to where development should be directed as such areas have the lowest risk.
- 4.65 Section 10 of the NPPF contains national planning policy relating to flood risk. A site specific Flood Risk Assessment (FRA) is required for a site of this size to demonstrate that the proposed development is appropriate and would remain safe throughout its lifetime and ensure that the development would not increase flood risk to surrounding land. A site specific FRA has been submitted and assesses the risk of all forms of flooding (tidal, fluvial, groundwater, surface water, sewer and flooding from artificial sources, namely ponds) to and from the proposed development. The application has been the subject of consultation both with the Environment Agency and Essex County Council sustainable drainage team.
- 4.66 The Environment Agency had placed a holding objection to the application until further information was provided by the applicants to the Environment

Agency with regard to the consideration of further modelling as to the impact of the development proposed upon Beeches Brook. The Environment Agency is now satisfied as to the impact upon Beeches Brook and has now withdrawn that temporary holding objection and recommends conditions to the grant of permission. Similarly the County Council's sustainable drainage team have considered the application details and also recommend conditions to the grant of permission. There are no material objections to the application from the specialist advisers for drainage matters.

Ecology – Protected Sites and Species

- 4.67 Policy DM27 requires consideration of the impact of development on the natural landscape including protected habitat and species. National planning policy also requires the planning system to contribute to and enhance the natural environment by minimising impacts on biodiversity, providing net gains in biodiversity where possible.
- 4.68 Local Authorities are required under the Conservation (Natural Habitats) Regulations (1994) to carry out an 'appropriate assessment' in respect of any plan or project which would not be directly connected to the management of the site for nature conservation and would either alone or in combination with other plans or projects would be likely to have a significant effect on a European Site of conservation importance. The purpose of an 'appropriate assessment' is to assess the implications of a proposal in respect of the sites conservation objectives.
- 4.69 Natural England has confirmed that in their view, the proposed development would not be likely to have significant adverse effect on the designated sites in proximity to the application site, stating that; the proposal site lies 2.2km to the south of the Crouch and Roach Estuaries SPA. Based on the rationale presented in the Environmental Statement (9.36-9.38, 9.95-9.99) and the assured provision of the significant quantum of green space (22.38ha being 48% of the red line site), it can be reasonably concluded that additional recreational pressures attributable to the proposed development are unlikely to have a significant effect. Consequently it is not necessary for an 'appropriate assessment' for the purposes of the Habitat Regulations to be carried out.
- 4.70 Based on the information provided, Natural England advise that the proposed development is not likely to have significant effects on the Crouch and Roach Estuaries Site of Special Scientific Interest (SSSI), Special Protection Area (SPA), and Ramsar (internationally important wetland) site which are nearby.
- 4.71 The site is an area of farmland that has for some time been put down to grazing and hay cropping. The accompanying ecological reports describe the

site generally to comprise semi – improved and improved grassland with sporadic trees and well managed hedged boundaries to the various fields. The submitted biodiversity survey includes results of a walk-over site survey and desk study which concluded the absence of rare or protected plant species and that the hedgerows were unlikely to be classified as important under the Hedgerow Regulations 1997. No badger activity was recorded on site. A condition is recommended to require all felling and removal of hedgerows to be undertaken outside of the bird nesting season. The provision of bird boxes as a measure of ecological enhancement and this has been incorporated into the landscaping condition.

- 4.72 The survey did however reveal the need for further work to specifically survey for Bats, Great Crested Newts and reptiles which the applicant has undertaken and included within the submitted documentation.

Bats

- 4.73 The applicants have undertaken a Bat emergence and return to roost survey which found no bats emerging or returning to roost on the site or site buildings. Bat species were however recorded foraging and commuting on the site and particularly the courtyard areas adjacent the house and stables.
- 4.74 The survey identifies that without mitigation the development would impact upon the foraging of bats by loss of foraging and commuting hedgerows, loss of grazed fields, potential fragmentation of commuting routes, impact of lighting and increased mortality from pet cat predation. To mitigate these affects, foraging habitat and connectivity replacement will need to be implemented in the detailed layout and landscaping of the site. In addition, any grassland should be created through the use of grassland seed mixes in the interests of preservation and enhancement of habitat for foraging bats. The recommended soft landscaping condition incorporates these requirements and subject to this it is considered that in respect of bats the proposed development would comply with local and national policy which seeks to conserve and enhance biodiversity and would not likely result in harm to this protected species. The report recommends the provision of bat boxes as a measure of ecological enhancement and this has been incorporated into the landscaping condition.

Great Crested Newts

- 4.75 Two ponds lay 430m and 450m to the south east of the site but separated by significant barriers including residential development and a main. A third pond located road 130m west of the site was the subject of six targeted presence/absence surveys by torchlight, pond netting, bottle trapping and egg searching. No Great Crested Newts were found at this pond with only one

frog and tadpoles being recorded. Breeding Great Crested Newts are not therefore present within 500m of the development site and do not present a constraint to the development proposed.

Reptiles

- 4.76 The applicants have undertaken a reptile survey of the site over 7 visits between May – July 2014 and found low populations of Common Lizard and Slow Worms (between 1 – 3 specimens) on each occasion. The density of refuges (artificial mats) was marginally higher than recommended guidelines giving an accurate representation of the use of the habitat within the site. The low population using the site was found to the north western fields close to the flood attenuation and public open space proposed. Recommendations are made for the barrier fencing of the site to prevent population by reptiles during construction and the management of the public open space as a reptile receptor site.
- 4.77 The submitted information does not include sufficient information at this outline stage to allow the Council to make an Appropriate Assessment of the application upon the European Sites under the Habitats Regulations Assessment. The site does however present only a negligible risk given the intervening long established settlement between the site and coastal areas important the overwintering birds. The site has also been the subject to sustainability and ecological consideration through the earlier allocations process. In this case, officers consider that a condition to the grant of permission is justified to allow the applicant to prepare additional information to inform the Council in making an Appropriate Assessment and the preparation of reserved matters to influence the design layout to provide the rural edge and buffer to the settlement edges to reduce impact upon the overwintering birds.

Archaeology

- 4.78 This application is accompanied by an archaeological desk based assessment of the site undertaken by CgMs consulting. The assessment includes the results of a desk-based evaluation of the archaeological record and historic landscape in the vicinity of the site.
- 4.79 The assessment identifies that the site has had a predominantly agricultural history with the existing field pattern largely intact since around 1780. Many finds have been recorded in the vicinity of the site over distance of some 1.5km. Two unexplained banked enclosures exist to the south west and north east of the group of farm buildings together with a possible medieval moat to the east. A Second World War floodlight position exists to the north western boundary of the site. The assessment recommends further investigation and

the preservation of the orientation of the historic field boundaries to be encouraged in the detailed layout.

- 4.80 Essex County Council Historic Environment team have been consulted on the proposed development and recommend mitigation which can be the subject of a planning condition to the grant of outline planning permission requiring evaluation by trial trenching and consequent mitigation. It is therefore recommended that a number of planning conditions be imposed on the grant of any outline consent as detailed at the end of the report. This approach to mitigating the impact of the proposed development on the archaeological heritage asset at the site is consistent with the assets significance and both national and local planning policy.

Contamination

- 4.81 The application is accompanied by a report examining contamination risk at the site based on consideration of desk-top data and site walkover. This report assesses the overall risk of contamination affecting the site as being low. The Council's Environmental Health Department are satisfied with the investigations carried out and conclusions of the report and raise no objection subject to several planning conditions which it is recommended are imposed. One to require remediation in the event that any contaminated material is discovered during ground works and one to require compliance certificates are provided for any material to be brought to the site for use as subsoil, topsoil or backfill.
- 4.82 Policy ENV11 advises that the presence of contaminated land is not in itself a reason to resist development but requires that sites are subject to thorough investigation and that necessary remediation is carried out. Subject to the recommended conditions the proposal would comply with this policy.

Air Quality

- 4.83 Policy ENV5 states that new residential development will be restricted in Air Quality Management Area (AQMA), however this site does not fall within an AQMA and the proposed residential development of the site is therefore acceptable in this regard. This policy also requires that proposed development will be required to include measures to ensure that it does not have an adverse impact on air quality. The proposed development would not be in close enough proximity to the only identified AQMA in the district, in Rayleigh High Street, such as to warrant the requirement of any mitigation in relation to this. Proposed highway improvements that would be required in relation to the proposed development along Hullbridge Road and to the proposed new roundabout junction of Rawreth Lane and Hullbridge Road the subject of application 16/00162/FUL are intended to reduce queuing and improve the

operation of the highway network to the benefit of air quality. The proposed development would not conflict with Policy ENV5.

Residential Amenity

- 4.84 At the outline stage a detailed site layout is not for determination so specific relationships between existing buildings and proposed dwellings cannot yet be considered in detail; this would be a matter for consideration in the later Reserved Matters application.
- 4.85 The concept Master Plan shows areas of the site proposed for residential development and other uses. In respect of the proposed residential development, this would all be sufficient distance from existing residential properties or be related in such a way as to logically extend existing road frontages into the site or backing onto existing development so as not to likely give rise to concerns relating to unreasonable impact on residential amenity at this outline stage.

Outdoor and Indoor Sports Provision

- 4.86 The NPPF at Section 73 acknowledges that opportunities for sport can make an important contribution to health and wellbeing of communities and identifies that planning policies should be based on robust and up-to-date assessments of the needs for sports facilities.
- 4.87 The application details state part of the site shown to the north western edge could provide if required for youth and junior pitches. Sport England reiterate that the Council's Playing Pitch Strategy identifies further need for junior and mini football pitches in Hullbridge as well as the need for a Rugby Pitch. There can however be conflict between such uses with adjoining residential settlement. Furthermore, members will be aware that existing public pitches are relatively underused given in part to the growth in private provision.
- 4.88 The Council's Assistant Director for Environmental Services however advises that the existing public pitches at Pooles Lane are underused owing to poor drainage. As such a commuted sum contribution of £70,000 would allow for the drainage of these pitches to bring them back into regular availability to address the demand to arising from the development proposed and the comments from Sport England. This can be a requirement of the legal agreement to accompany the grant of outline permission.

5 CONCLUSION

- 5.1 In determining this application regard must be had to section 38(6) of the Planning and Compulsory Purchase Act 2004, which requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise.

- 5.2 The application site is designated land within Policy SER6a and SER 6b where the principle of the proposed residential development is accepted. It is considered that the proposed development would meet the necessary infrastructure requirements associated with this policy designation and would, subject to conditional approval and a Legal Agreement adequately mitigate impacts associated with the development including those related to the highway network and flood risk.
- 5.3 Subject to the recommended conditions and Legal Agreement, the proposal is policy compliant with respect to relevant Core Strategy and other planning policies and there are no other material planning reasons to refuse consent.
- 5.4 Members will note at Condition 2 below that it is recommended that outline planning consent be granted with an extended timeframe for implementation, allowing 5 years for the submission of all Reserved Matters applications, this is considered reasonable given the scale of development proposed and phasing in the allocations plan between the two parts of the site.

6 RECOMMENDATION

- 6.1 It is proposed that the Committee **RESOLVES**

That the application be **APPROVED**, subject to the completion of a **LEGAL AGREEMENT** under Section 106 of the Act for the heads of terms set out below and subject to the **heads of CONDITIONS** as set out below, subject to any reasonable changes the Assistant Director, Planning Services shall deem fit:-

- a) Provision of Hullbridge Road / Rawreth Lane roundabout the subject of application 16/00162/FUL or the revisions to that junction proposed in this application should the application for the new roundabout junction not be approved- Prior to 50th occupation or such other trigger as to be advised by the County Highway Authority.
- b) Provision of Watery Lane junction right turn improvements as recommended by the County Highway Authority.
- c) Provision of Watery Lane improvements – signage.
- d) Education contribution- £2,201,540.
- e) Payment of a £3000 Travel Plan Monitoring fee to ECC relating to the residential Travel Plan.
- f) Provision and implementation of a Residential Travel Information Pack for every household.

- g) Provision of 12 month season tickets for bus travel to all eligible occupiers of the development (max 2 per household).
- h) A minimum of 35 percent affordable housing shall be provided in each phase (Reserved Matters application site area) to a mix of 80 percent affordable rent and 20 percent intermediate housing subject to delivery triggers, appropriate location of units within the site, appropriate dwelling type/size, nomination rights and other relevant matters.
- i) Youth facilities provision by way of skate board park in the development. In the event RDC decline the transfer, facilities to be maintained in perpetuity by a management company.
- j) Contribution towards Scheme for the drainage of Pooles Lane sports pitches (£70k).
- k) Provision of a Sustainable Urban Drainage system in accordance with details agreed by the relevant planning condition. Maintenance of the system by a management company, statutory water undertaker or the County Council (should the County Council become an approved body) in perpetuity to be undertaken in accordance with a maintenance schedule to be submitted and agreed by the Local Planning Authority.
- l) Payment of a financial contribution of £164,560 for capital projects associated with delivery of primary health care services in the vicinity of the site.
- m) Provision of public open green space in accordance with the requirements of the relevant planning conditions and maintenance of these areas and any play equipment within these areas by a management company.
- n) Contributions to cycle route 135 across the district
- o) Maintenance of bridle way to open space within the site.

HEADS OF CONDITIONS

Reserved Matters

1. No development shall commence within any phase (Reserved Matters application site area) until plans and particulars showing precise details of the layout, scale, design and external appearance, access (save for access points to the site as shown on the approved Parameters Plan) and landscaping of the site, (herein after called the "Reserved Matters"), within the phase have been submitted to and approved in writing by the Local Planning Authority. All development at the site

shall be carried out in accordance with the Reserved Matters' details approved.

Submission of reserved matters

2. In the case of the reserved matters, application for the first residential reserved matters application for approval shall be made no later than the expiration of two years beginning with the date of this permission. Application for the approval of the remaining "Reserved Matters" referred to in Condition 1 above shall be made to the Local Planning Authority before the expiration of five years from the date of this planning permission. The development to which this permission relates must be begun not later than the expiration of two years from the final approval of the Reserved Matters or, in the case of approval on different dates, the final approval of the last such matter to be approved.

Commencement

3. The development to which this permission relates shall be commenced not later than the expiration of two years from the approval of the first reserved matter and the remainder of the development shall be begun not later than:-
 - (i) the expiration of five years from the date of the grant of Outline Planning permission, or
 - (ii) within five years of the approval of the reserved matters for the phase or, in the case of approval on different dates, the final approval of the last reserved matters to be approved.

Approved plans

4. The development hereby approved shall be constructed in strict accordance with the approved plans; (to be listed)

Quantum of development

5. The residentially developable areas as shown on the approved Parameters Plan shall accommodate no more than 500 dwellings in total.
6. **Submission of public realm design strategy for the whole site**
Prior to the submission of any Reserved Matters application, a public realm design strategy for the whole site, including details within different areas of proposed palettes of materials for surfaces, lighting, street furniture, street trees including species and grille details if proposed, signage and boundary treatments should be submitted to

and agreed in writing by the Local Planning Authority. The Reserved Matters submissions should then accord with the approved public realm design strategy.

REASON: In order to secure a high standard of design of the public realm across the site as a whole.

7. Submission of design brief prior to submission of reserved matters

Prior to the submission of each application under the Reserved Matters, a Design Brief for that phase of the site to which the Reserved Matters application relates, shall be submitted to and approved in writing by the Local Planning Authority. The Design Brief shall include scaled plans and details of:-

- a) Identification of distinctive character areas with details submitted in relation to each to incorporate details of items b) to o) below with regard to design principles contained within the Essex Design Guide 2005 and context of the site.
- b) The street hierarchy, including the principles of adopting highway infrastructure, and typical street cross-sections including relationships of new buildings to the street.
- c) How the design of the streets and spaces takes into account mobility and visually impaired users.
- d) Block principles to establish density and building typologies. In addition, design principles including primary frontages, pedestrian access points, fronts and backs and perimeter of building definition.
- e) Information about height, scale, form and building style, level and type of enclosure/boundary treatments, building materials and design features.
- f) Landmarks and legibility, vistas and views and types of spaces and their proposed use.
- g) Approach to parking and accommodating the car.
- h) Approach to provision of Sustainable Urban Drainage.
- i) The conceptual design and approach to the treatment of the public realm within the residentially developable area of the site to include materials, utilities and street furniture.
- j) Approach to incorporation of ancillary infrastructure such as pipes, vents, meter boxes etc, required by statutory undertakers.

- k) Details of the approach to cycle parking including distribution, type and design of storage facilities.
- l) Approach to the character and treatment of structural planting within the residentially developable area.
- m) Approach to the treatment of footpaths/footways within the residentially developable area.
- n) The conceptual design and approach to the lighting strategy.
- o) Details of measures to minimise opportunities for crime.

REASON: In order to control more closely the parameters for the working up of the detailed design to ensure the development of the site achieves a high standard of design, appropriate to the context of the site.

Provision of site access roundabout

- 8. 1) Prior to commencement of the development, the proposed site roundabout access on Lower Road shall be provided as shown in principle on CCE dwg F221-101 rev A with clear to ground visibility splay. Such vehicular visibility splays shall be provided before the road junction is first used by vehicular traffic and retained free of any obstruction at all times.

Reason: To provide adequate inter-visibility between vehicles using the road junction and those in the existing public highway in the interest of highway safety in accordance with policy DM1 of the Development Management Policies as adopted as County Council Supplementary Guidance in February 2011.

Provision of Malyons Lane alterations / works

- 9. 2) No more than 200 units shall be occupied from the Lower road junction until such time as the proposed secondary site vehicle access on Malyons lane is provided as shown in principle on CCE dwg F221-102.

Reason: To make adequate provision within the highway for additional traffic generated as a result of the proposed development and in the interest of highway safety in accordance with policy DM1 of the Development Management Policies as adopted as County Council Supplementary Guidance in February 2011.

Submission of Timescale for pedestrian and cycle access points

- 10. Prior to commencement of development details of and timescale for the provision of the proposed access for pedestrian / cyclists at The

Priorities, Harrison Gardens and Windermere Avenue shall be submitted to and agreed by the Local Planning Authority.

Reason: To make adequate provision within the highway for additional traffic generated and In the interests of reducing the need to travel by car and promoting sustainable development and transport in accordance with policy DM1 of the Development Management Policies as adopted as County Council Supplementary Guidance in February 2011.

Pedestrian visibility splay

11. Prior to commencement of the development a 1.5 metre x 1.5 metre pedestrian visibility splay, as measured from and along the highway boundary, shall be provided on both sides of the vehicular accesses. Such visibility splays shall be retained free of any obstruction in perpetuity. These visibility splays must not form part of the vehicular surface of the access.

Reason: To provide adequate inter-visibility between the users of the access and pedestrians in the adjoining public highway in the interest of highway safety in accordance with policy DM1 of the Development Management Policies as adopted as County Council Supplementary Guidance in February 2011.

Gradient to parking access areas

12. The gradient of the any proposed vehicular access / garage drive / hard standing shall be not steeper than 4% (1in 25) for the first 6 metres from the highway boundary and not steeper than 8% (1in 12.5) thereafter.

Reason: to ensure that vehicles can enter and leave the highway in a controlled manner in the interest of highway safety to ensure accordance with safety in accordance with policy DM1 of the Development Management Policies as adopted as County Council Supplementary Guidance in February 2011.

Surface water drainage details for parking areas

13. Prior to commencement of the development details showing the means to prevent the discharge of surface water from the development onto the highway shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety prior to the access becoming operational and shall be retained at all times.

Reason: To prevent hazards caused by water flowing onto the highway and to avoid the formation of ice on the highway in the interest of highway safety to ensure accordance with policy DM1 of the Development Management Policies as adopted as County Council Supplementary Guidance in February 2011.

Additional Note:

With reference to the above condition the applicants attention should be drawn to the recent alterations to householder "permitted development" in so far as there is now the need to provide a permeable solution (SUDS) for the hard standing to reduce the cumulative impact of surface water run off and overloading of sewers.

Surface treatment of parking and access areas

14. No unbound material shall be used in the surface treatment of the vehicular access within 6 metres of the highway boundary.

Reason: To avoid displacement of loose material onto the highway in the interests of highway safety in accordance with policy DM1 of the Development Management Policies as adopted as County Council Supplementary Guidance in February 2011.

Construction method statement

15. No development shall take place, including any ground works or demolition, until a Construction Method Statement has been submitted to, and approved in writing by, the local planning authority. The approved Statement shall be adhered to throughout the construction period. The Statement shall provide for:-

- i. the parking of vehicles of site operatives and visitors
- ii. loading and unloading of plant and materials
- iii. storage of plant and materials used in constructing the development
- iv. wheel and underbody washing facilities

Reason: To ensure that on-street parking of these vehicles in the adjoining streets does not occur and to ensure that loose materials and spoil are not brought out onto the highway in the interests of highway safety and Policy DM 1 of the Highway Authority's Development Management Policies February 2011.

Highway Boundary planting set back

16. The any new boundary planting shall be planted a minimum of 1 metre back from the highway boundary and any visibility splay.

Reason: To ensure that the future outward growth of the planting does not encroach upon the highway or interfere with the passage of users of the highway, to preserve the integrity of the highway and in the interests of highway safety and in accordance with Policy DM1 of the Development Management Policies as adopted as County Council Supplementary Guidance in February 2011.

Parking space size

17. Each vehicular parking space shall have minimum dimensions of 2.9 metres x 5.5 metres.

Reason: To ensure adequate space for parking off the highway is provided in the interest of highway safety in accordance with Policy DM8 of the Development Management Policies as adopted as County Council Supplementary Guidance in February 2011.

Garage space size

18. All single garages should have a minimum internal measurement of 7m x 3m, All double garages should have a minimum internal measurement of 7m x 5.5m, All tandem garages should have minimum internal measurements of 12m x 3m

Reason: To encourage the use of garages for their intended purpose and to discourage on-street parking, in the interests of highway safety and in accordance with Policy DM8 of the Development Management Policies as adopted as County Council Supplementary Guidance in February 2011.

Non – obstruction to public footpath

19. The public's rights and ease of passage over public footpath no7 shall be maintained free and unobstructed at all times.

Reason: To ensure the continued safe passage of the public on the definitive right of way and accessibility in accordance with Policies DM1 and DM11 of the Development Management Policies as adopted as County Council Supplementary Guidance in February 2011.

Submission of detailed drainage strategy

20. Prior to commencement of the above development a detailed drainage strategy must be submitted for approval to the local authority. It should be based on principles of Sustainable drainage, in line with the approved FRA CCE/F221/FRA-03 permitted by this planning permission. The detailed drainage scheme should follow mitigation

measures detailed within the FRA including:-

- Limiting the discharge from the site to 3.5l/s/ha for all events up to the 1 in 100 year storm plus a 30%.
- Provide attenuation storage (including locations on layout plan) for all storm events up to and including the 1:100 year storm event inclusive of climate change and urban creep.
- Ensuring the appropriate level of treatment for all runoff leaving the site, in line with table 3.3 of the CIRIA SuDS guide.
- Provide information about exceedance routes should be provided to indicate what route flows would take should a feature become blocked and cause surface water flooding.

The mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the timing / phasing arrangements embodied within the scheme, or within any other period as may subsequently be agreed, in writing, by the local planning authority.

Reason: To prevent the increased risk of flooding, both onsite and offsite, and minimize the risk of pollution of surface water by ensuring the provision of a satisfactory means of surface water control and disposal during and after development.

Submission of scheme to minimise surface water flooding from construction works

21. The development hereby permitted shall not be commenced until such time as a scheme to minimise the risk of offsite flooding caused by surface water run-off and groundwater during construction works has been submitted to, and approved in writing by, the local planning authority. The scheme shall be implemented as approved.

Reason:

- The National Planning Policy Framework paragraph 103 states that local planning authorities should ensure flood risk is not increased elsewhere by development.
- Construction may lead to excess water being discharged from the site. If dewatering takes place to allow for construction to take place below groundwater level, this will cause additional water to be discharged. Furthermore the removal of topsoil's during construction may limit the ability of the site to intercept rainfall and may lead to increased runoff rates. To mitigate against increased

flood risk to the surrounding area during construction therefore, there needs to be satisfactory storage of/disposal of surface water and groundwater which needs to be agreed before commencement of the development.

Submission of surface water drainage maintenance plan

22. Prior to commencement of the development the applicant must submit a Maintenance Plan detailing the maintenance arrangements including who is responsible for different elements of the surface water drainage system and the maintenance activities/frequencies.

Reason: To ensure appropriate maintenance arrangements are put in place to enable the surface water drainage system to function as intended to ensure mitigation against flood risk.

Suds maintenance logs

23. The applicant must keep yearly Maintenance Logs of maintenance which should be carried out in accordance with any approved Maintenance Plan.

Reason: To ensure the SuDS are maintained for the lifetime of the development as outlined in any approved Maintenance Plan so that they continue to function as intended to ensure mitigation against flood risk.

Condition

The development permitted by this planning permission shall be carried out in accordance with the approved Flood Risk undertaken by Cannon Consulting Engineers Referenced: CCE/F221/FRA-03 and dated October 2014 and the following mitigation measures detailed within the Flood Risk Assessment (FRA)

Finished ground floor levels are to be set no lower than 7.17 metres above Ordnance Datum (AOD); 300mm above the design 1% Annual Event Probability (AEP) flood level.

The mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the timing / phasing arrangements embodied within the scheme, or within any other period as may subsequently be agreed, in writing, by the local planning authority.

Reason: To reduce the risk of flooding to the proposed development and future occupants.

Archaeological

24. Archaeological evaluation by trial trenching shall be undertaken prior to the submission of any detailed layout proposals, with a report submitted with the reserved matters application. This work shall be undertaken to the standards required by the local planning authority and specified in an archaeological brief issued by the local planning authority acting through its historic environment advisors.
25. An archaeological mitigation strategy detailing the excavation strategy shall be agreed with the local planning authority through its historic environment advisors and submitted with the reserved matters applications.
26. No development or preliminary groundworks can commence until the satisfactory completion of fieldwork, as detailed in the mitigation strategy, and signed off by the local planning authority through its historic environment advisors.
27. The applicant will submit to the local planning authority a post-excavation assessment (to be submitted within six months of the completion of fieldwork, unless otherwise agreed in advance with the Planning Authority). This will result in the completion of post-excavation analysis, preparation of a full site archive and report ready for deposition at a registered museum, and submission of a publication report (to be completed within two years of the completion of fieldwork, unless otherwise agreed in advance with the Planning Authority, through its historic environment advisors)."

Control over imported fill material

28. Prior to the importation of any material brought onto the site for use as subsoil, topsoil or backfill, a compliance certificate for that material proposed to be imported to the site shall be submitted to and agreed in writing by the Local Planning Authority..

Contamination

29. In the event that contaminated material or asbestos is found at any time when carrying out the approved development that was not previously identified it must be reported in writing immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken in accordance with the following requirements and a report submitted to and approved in writing by the Local Planning Authority to include:-
 - (i) a survey of the extent, scale and nature of contamination

- (ii) an assessment of the potential risks to:-
 - human health,
 - property (existing or proposed) including buildings, crops, livestock, pets, woodland and service lines and pipes,
 - adjoining land,
 - groundwaters and surface waters,
 - ecological systems,
 - archaeological sites and ancient monuments;
- (iii) an appraisal of remedial options, and proposal of the preferred option(s).

This must be conducted in accordance with DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11' and the Essex Contaminated Land Consortium's 'Land Affected by Contamination: Technical Guidance for Applicants and Developers'.

Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment must be submitted to and approved in writing by the Local Planning Authority. The scheme must include all works to be undertaken, proposed remediation objectives and remediation criteria, timetable of works and site management procedures. The scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

The Local Planning Authority must be given two weeks written notification of commencement of the remediation scheme works and must complete the remediation works in accordance with the scheme approved. Following completion of measures identified in the approved remediation scheme a verification report that demonstrates the effectiveness of the remediation carried out must be submitted to the Local Planning Authority and approved in writing by the Local Planning Authority.

Prior to occupation of any property hereby permitted the developer shall submit to the Local Planning Authority a signed certificate to confirm that the remediation works have been completed in

accordance with the documents and plans detailed in the approved remediation scheme.

Submission and implementation of landscaping details

30. Prior to the provision of strategic open space (natural/semi-natural greenspace and amenity greenspace as identified on the approved Parameters Plan) or localised open space and landscaping within the developable areas including in the local greens, details of the proposed hard and soft landscaping shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall include (where applicable) details and plans (at an appropriate scale) of:-
- Schedule of species, size, density and spacing of all trees, shrubs and hedgerows to be planted to include native species of UK origin including Field Maple, Dogwood, Hawthorn, Spindle, Crab Apple, Blackthorn, Hazel, Goat Willow and Elder;
 - Substantial hedgerow corridors providing links across the site;
 - Grassland areas and the use of grassland seed mixes in these;
 - A full plan (to scale) that clearly shows the locations of new trees to be planted including planting method statement and after care plan;
 - Existing trees to be retained;
 - Provision of bird and bat boxes;
 - Areas to be grass seeded or turfed, including cultivation and other operations associated with plant and grass establishment;
 - A long-term maintenance schedule and specifications including timetable for monitoring and maintenance;
 - Location and material details of paved or otherwise hard surfaced areas/paths within the public open space;
 - Long-term design objectives in respect of the public open space area;
 - Existing and finished levels shown as contours with cross-sections as required;
 - Location of lighting including details of lighting to be installed which shall be low pressure sodium lighting at levels kept as low as possible (between 1 and 3 lux where possible), directed to where it is needed, away from hedgerows with lighting columns kept as short as possible (ideally 3 metres or less).

- Means of enclosure and other boundary treatment including materials to be used and location of these shown on a plan;
- Minor artefacts and structures (e.g. benches, bins, signs etc)
- Surfacing to provide cycling, walking and bridleway routes.

The soft landscaping agreed within the residentially developable areas shall be planted/provided in its entirety during the first planting season (October to March inclusive) following commencement of the development within the phase (Reserved Matters application site area) to which the landscaping relates or in any other such phased arrangement as may be agreed in writing by the Local Planning Authority. Any tree, shrub or hedge plant (including replacement plants) removed, uprooted, destroyed, or be caused to die, or become seriously damaged or defective, within five years of planting, shall be replaced by the developer(s) or their successors in title, with species of the same type, size and in the same location as those removed, in the first available planting season following removal. The hard landscaping within the residentially developable areas as agreed shall be completed in accordance with a phased arrangement to be submitted and agreed in writing by the Local Planning Authority or prior to final occupation within the phase whichever is earlier and retained in the approved form.

Protection of existing trees

31. Prior to commencement of development within each phase (Reserved Matters application) a scheme for the protection of trees/hedgerows to be retained within or immediately adjacent to the site associated with that phase shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall include;
 - a. A plan that shows the accurate position, crown spread and root protection area in accordance with paragraph 5.2.2 of BS5837 of every retained tree on the site and on neighbouring or nearby ground to the site. The accurate positions of all trees to be removed shall also be indicated on the plan.
 - b. Details of each retained tree in a separate schedule in accordance with paragraph 4.2.6 of BS5837.
 - c. A schedule of tree works for all the retained trees specifying pruning and other remedial or preventative work. All tree works

shall be carried out in accordance with BS3998, 1989, 'Recommendations for Tree Work'.

- d. Details and positions of the Ground Protection Zones in accordance with section 9.3 of BS5837.
- e. Details and positions of Tree Protection Barriers.
- f. Details and positions of the Construction Exclusion Zones in accordance with section 9 of BS5837.
- g. Details and positions of the underground service runs in accordance with section 1 1.7 of BS5837.
- h. Details of any changes in levels or the position of any proposed excavations within 5 metres of the Root Protection Area of any retained tree, including those on neighbouring or nearby ground in accordance with paragraph 5.2.2 of BS5837.
- i. Details of any special engineering required to accommodate the protection of retained trees (e.g. in connection with foundations, bridging, water features, surfacing) in accordance with section 10 of BS5837.
- j. Details of the working methods to be employed for the installation of drives and paths within the RPAs of retained trees in accordance with the principles of "No-Dig" construction.
Details of the working methods to be employed for the access and use of heavy, large, difficult to manoeuvre plant (including cranes and their loads, dredging machinery, concrete pumps, piling rigs, etc) on site.
- k. Details of the working methods to be employed for site logistics and storage, including an allowance for slopes, water courses and enclosures, with particular regard to ground compaction and phytotoxicity.
- l. Details of the method to be employed for the stationing, use and removal of site cabins within any root protection areas in accordance with paragraph 9.2.3 of BS5837.
- m. Details of tree protection measures for the hard landscaping phase in accordance with sections 13 and 14 of BS5837.
- n. The timing of the various phases of the works or development in the context of the tree protection measures.

Development shall proceed in accordance with the approved tree protection scheme with the agreed Tree Protection Barriers erected

prior to commencement of development within the phase to which they relate and will remain in place, and undamaged for the duration of construction within that phase.

Protection of Great Crested Newts during construction

32. Prior to commencement of development (including any groundworks) in each phase, an EPS (European Protected Species) mitigation strategy will be prepared, in consultation with the Local Planning Authority and Natural England, for the protection of great crested newts during construction. The approved scheme will be submitted to the LPA prior to the commencement of development and shall be implemented in accordance with the terms of the EPS licence, unless variations are approved.

Retention of hedgerows

33. Existing hedgerows and trees indicated to remain on Drawing Number 3878-D-1 submitted as part of the Arboriculture Report shall remain and not be felled or removed. Those sections of existing hedgerow and trees indicated to be felled/removed on this same plan shall only be felled/removed/managed outside of the bird nesting season (March to August inclusive) unless otherwise agreed in writing with the Local Planning Authority in which case details justifying works outside these times shall be submitted to and approved in writing by the Local Planning Authority.

Wheelchair accessible designs

34. At least 3 per cent of new dwellings within each phase (Reserved Matters application area) shall be built to wheelchair accessibility standards as required by Policy H6 until such as time as the proposed access changes to the Approved Document M on access to and use of buildings volume 1 dwellings standards forming part of the Building Regulations come into force after which time at least 3 per cent of new dwellings within each phase (Reserved Matters application area) must be built to meet the optional standard M 4(3) set out in Approved Document M Building Regulations Category 3b (as consulted on by national government in the Housing Standards Review Technical Consultation Approved Document M dated September 2014 (DCLG) or as amended when formally adopted). Prior to or concurrent with each Reserved Matters application, details of compliance with the above requirement for the area to which the Reserved Matters application relates, shall be submitted to and approved in writing by the Local Planning Authority.

Code for sustainable homes – water efficiency

35. All new dwellings shall achieve Code for Sustainable Homes Code Level 4 as a minimum in respect of water efficiency until such a time as Approved Document G on water efficient standards forming part of the Building Regulations (as consulted on by national government in Autumn 2014 or any subsequent further amendment or variation to the Autumn 2014 consultation draft technical standard) comes into force after which all new dwellings shall achieve water efficiency equivalent to the proposed optional standard set out in the Approved Document G Building Regulation Building Regulations standard as a minimum i.e. that new dwellings are designed so that their estimated average water consumption would be no more than 110 litres per person per day. Concurrent with each Reserved Matters application, details of compliance with the above requirement for all dwellings within the area to which the Reserved Matters application relates shall be submitted to and approved in writing by the Local Planning Authority. Dwellings shall be constructed to the agreed details.

Code for sustainable homes – energy efficiency

36. All new dwellings shall achieve Code for Sustainable Homes Code Level 4 as a minimum in respect of energy efficiency. Prior to or concurrent with each Reserved Matters application, details of compliance with the above requirement for all dwellings within the area to which the Reserved Matters application relates, shall be submitted to and approved in writing by the Local Planning Authority. Dwellings shall be constructed to the agreed details.

10% renewable energy

37. Prior to the occupation of any dwelling within each phase (Reserved Matters application site) details shall be submitted to and approved in writing by the Local Planning Authority to demonstrate how at least 10 per cent of the energy from the development within the phase would be provided from a decentralised and renewable or low-carbon sources unless this is not feasible or viable or unless provision of such would be at the expense of provision of a higher specification energy efficient building fabric (in relation to condition 29 above) in which case a report demonstrating the case and the amount (decentralised/low-carbon/renewable energy) that would be provided shall be submitted to and agreed in writing by the Local Planning Authority. The measures as agreed shall be implemented prior to the occupation of the dwellings to which the measures relate.

Provision of play space

38. A minimum area of 0.06 hectares for play space shall be provided to the development . Details of equipment proposed shall be submitted to and agreed in writing by the Local Planning Authority prior to provision on site. At least one of the two play spaces shall be provided as a local equipped area for play (LEAP).

Submission of details of Bridle Path in reserved matters

Submission of details for the provision of a Bridle Path around the overall site in reserved matters.

APPENDIX 1

Neighbour representations

A petition in two parts has been received with a total of 213 signatures making the following objections (summarised):

1. Paragraph 66 of the National Planning Policy Framework states the applicants will be expected to work closely with those directly affected by their proposals. Despite holding two exhibitions the applicant has failed to provide any feedback prior to submission on the matters raised and instead merely listed comments received. The application should be rejected and the applicants made to work with the Residents Association.
2. The name of the applicant (Southern and Regional Development of Gibraltar) is someone we have no previous knowledge of and different to Landhold Capital of St. Johns Wood London. We firmly believe this brings into question the robustness towards delivering in the required time frame. Object until proof has been obtained on the ability of the applicant to deliver as required.
3. The application has been incorrectly completed. It states "0" garages and parking spaces yet states 500 dwellings together with associated access, car parking, landscaping, open space and related works.
4. The application states 500 dwellings but this does not comply with Core Strategy policy H3 which allocates part of the site post 2021 and will safeguard land with the exception of releases as per policy H2.
5. The boundary line between Rawreth and Hullbridge have not been mentioned in any statements. The Hullbridge Residents Association assessment indicates 30.5% of the area belongs to Rawreth and question therefore the reliability of the plans put forward and in breach of the Core Strategy, LDF clauses, section 9 paragraphs 80, 87 and 89.
6. The number of Affordable Homes has increased from 35% to over 90%. These are all three storey. The submitted Design and Access Statement clearly indicates the erection of three storey buildings will not be in keeping with the existing design in the village and will create a "them and us" environment not conducive to cohesion. This goes against NPPF paragraphs 58, 59, 60 and 61 and as we have never been asked about our feeling for three storey buildings paragraph 66.
7. A telecommunications Mast is indicated on the plan and our investigation establishes that environmental regulations do not allow any to be erected within a radius of 400m. There is no mention of the mast in the documents.
8. The Flood Risk Assessment uses the EA surface water flood maps but does not advise or take into account the restrictions in the model used by the EA.

- i.e. Tidal gates. There is no proof that the data used is current i.e. what constitutes a 1 in 100 rainfall event. Paragraph 158 to the NPPF requires the Council to use up to date and relevant evidence. This by default, means the applicant must do likewise. We believe this is not the case here.
9. The traffic assessment (paragraph 2.3.1) does not comply with paragraph 158 to the NPPF as it states data used is from 2010. This is rather confusing as the applicant had a comprehensive traffic survey conducted around October 22nd. HRA did a simple traffic count between 6.00am – 9.00am and 3.00pm – 7.00pm suggesting there were 1400 cars per hour using the Hullbridge Road / Lower Road and Watery Lane in the rush hours, separations were given for each road. We are not convinced that the plans submitted will solve traffic problems.
 10. Roundabouts. Two new roundabouts are proposed the main large one some 212m from the Budgens store roundabout and the next, smaller one some 90m from the larger one. Far from easing the traffic congestion presently a problem, will undoubtedly increase the congestion. Three roundabouts within a short distance is unacceptable. An alternative solution must be found.
 11. The distinction in number of dwellings proposed to be built in areas each side of the boundary line and the separation of the site into two areas SER 6a and SER 6b is not apparent on the drawings and no explanation is given for this anomaly.
 12. We are not convinced that the proposed means of access through Malyons Lane connecting the site is adequate in width. We are not convinced that other access points “The Priors” Harison Gardens and Windermere Avenue will not be used as no guarantee is provided. Traffic congestion will be a huge problem more than it is at the present time and any congestion will affect the whole village with one way in and out of Hullbridge. If this development is approved calculations suggest there will be at least a 90% increased population with corresponding increase in traffic and loss of identity as a village.

Two petitions have been received with a total of 196 signatures.

1127 letters and responses have been received from the following addresses:-

Abbey Close: 1, 5, 8

Abbey Road: 1, 2 (4 letters), 4, 5, 6 (3 letters), 10, 11 (2 letters), 15 (2 letters), 17, 19 (2 letters), 20, 22, 29 (3 letters), 38, 40, 42 (3 letters), 45 (4 letters), 46, 47 (6 letters),

49 (2 letters), 51 (4 letters), 57, 59 (2 letters), 60, 61, 63 (4 letters), 65, 67, 69 (2 letters), 73 (2 letters), 77 (2 letters)

Alfreda Avenue: 1a, 3, 5 (2 letters), 7, 24

Almond Avenue, Tower Park: 4

Ambleside Gardens: 1 (2 letters), 2, 2a (2 letters), 3, 4, 5 (5 letters), 6, 6a (4 letters), 15 (2 letters), 21, 22, 23 (3 letters), 24 (2 letters), 26, 28, 37 (2 letters), 41 (2 letters), 43

Ashdene Close: No number, 8 (2 letters), 14 (2 letters)

Ashfield: 6

Beech Avenue: 6

Beech Road: 1, 9

Birchdale: 1, 10, 11, 19, 21, 23, 25

Broom Road: Cedars (2 letters), Nye Timber, Rodgements, Treetops (3 letters)

Burnham Road: 12 (5 letters), 18a, 41, 58, 59 (2 letters), 62 (2 letters), 66 (2 letters), 68 (4 letters), 72 (2 letters), 80, 81, 85, 101, 103 (2 letters), 113, 130 (2 letters), 142, 144 (2 letters), 158, 224 (2 letters)

Cecil Way: 10

Cedar Drive: 8 (2 letters), 20 (2 letters), 31a (2 letters), 42 (3 letters)

Central Avenue: 6, 10, 12 (6 letters), 16, 30 (2 letters), Acorns at Four Oaks (2 letters), Four Oaks (4 letters)

Cheapside East: 22

Cherrydene Close: 1, 4, 6

Chestnut Close: 47

Cordelia Crescent: 28

Cornhill Avenue: 51

Coventry Close: 7 (4 letters), 8 (3 letters), 21 (3 letters)

Cranleigh Gardens: Prosperity (2 letters), The Hedges

Creek View Avenue: no number, 2, 4, 8 (2 letters), 9 (2 letters), 10 (2 letters), 11 (2 letters), 14, 24, 26 (3 letters), 30, 32, 33

Crouch Avenue: 4, 28a, 30, 46 (4 letters), 45, 48, 58, 59, 66, 72, 83 (2 letters), 84 (5 letters), 89, 91 (2 letters), 92 (2 letters), 93 (4 letters), 95 (3 letters)

Crouch Meadow, Pooles Lane: 3 (2 letters), 4, 7, 12, 14 (2 letters)

Crouch Park, Pooles Lane: 12 (3 letters), 34, 51, 64

Crouch View Grove: 17 (3 letters), 18 (2 letters), 22

Dobsons Close: 6

Downhall Park Way: 2, 65, 143

Downhall Road: 30, 62, 98

Eastwood Road, White House Court: Flat 7 (2 letters)

Elm Grove: 6 (3 letters), 7 (2 letters), 8, 9, 18 (2 letters), 19 (6 letters), 20 (2 letters), 25, 30 (4 letters), 35 (2 letters), 42 (2 letters)

Everest: 15 (2 letters), 18

Ferry Road: 8, 12 (2 letters), 17, 28, 33 (2 letters), 38 (4 letters), 39, 46, 48, 55, 57 (2 letters), 61 (8 letters), 62, 63, 64, 68, 69, 76a, 77 (2 letters), 78, 79, 83, 87, 89, 93 (2 letters), 101a (2 letters), 103 (2 letters), 107, 113 (5 letters), 116, 126, 137, 144, 145
Flat 3, 147 (2 letters), 160, 162, 163a, 166, 186, 187 (2 letters), 188, 189 (2 letters), 192, 195, 203 (3 letters), 206, 213, 217, 219, 223, 224, 233, 234 (Flat 9), 235, 237, 249a, 259, 275 (2 letters), 283, 295 (3 letters), 297 (2 letters), 298, 299 (4 letters),
One Stop

Gosfield Close: 1

Grasmere Avenue: no number, 6, 7a (3 letters), 16, 17 (3 letters), 22 (2 letters), 28, 33 (4 letters), 37, 45, 48 (3 letters), 51, 52, 56, 57, 59 (2 letters), 60, 61, 63 (5 letters), 68, 82 (2 letters), 89, 92 (2 letters), 94, 96 (2 letters), 98 (2 letters), 101 (2 letters), 102 (2 letters), 106 (2 letters)

Halcyon Park: 7, 61, 75, 78 (2 letters)

Hardwick Close: 8

Harrison Gardens: 1, 3, 7 (2 letters), 8 (3 letters), 12 (2 letters), 14, 18, 20

Hartford Close: 27

Hedgehope Avenue: 16

Heron Close: 4

Heron Gardens: 89

High Elms Road: 5, 7, 12, 14a, 17, 20 (3 letters), 21 (3 letters), 22, 24 (2 letters), 25

Highbank, Tower Park: 3

Highfield Tower Park, Pooles Lane: 16, 25 (2 letters)

Highmead: 18 (2 letters)

Hillcrest Avenue: 1 (2 letters), 6, 19 (2 letters), 21, 31 (2 letters), 34, 41, 57 (2 letters), 59 (2 letters), 61, 62 (2 letters), 69, 77, 82, 84

Hilltop Avenue: 21 (3 letters), 26 (2 letters), 32, 37 (2 letters), 43 (2 letters), 51, 54, 72 (3 letters)

Hockley Park, Lower Road: 5 (2 letters), 22, 25 (2 letters), 59

Hockley Road: 55

Horseshoe Lawns, Tower Park: 15, 32, 38

Hullbridge Road: 11, 44

Kelso Close: 11

Kendal Close: 1, 3 (2 letters), 6 (4 letters), 26

Kenilworth Gardens: 5

Kestral Grove: 21 (2 letters)

Keswick Avenue: 8 (2 letters), 14, 16, 20 (2 letters), 34, 37, 38, 42, 45 (2 letters), 51, 55 (7 letters), 57 (3 letters), 60, 63 (2 letters), 66, 74 (4 letters), 76 (3 letters), 80, 82, 83 (4 letters), 85 (2 letters), 87 (2 letters)

Kingsman Farm Road: Cedar Lodge, Freshwinds (2 letters)

Langham Drive: 93

Leonard Drive: 18

Lincoln Way: 15

London Hill: 36

Lower Road: 31 (2 letters), 32 (2 letters), 37 (3 letters), 40 (2 letters), 41 (2 letters), 63, 79 (2 letters), 92a (2 letters), 94 (2 letters), 105 (3 letters), 107 (3 letters), 109 (2 letters), 121, 124, 126, 130, 132, 146, 148, 153, 154, 155, 162, 164, 165, 168, 171, 246, 262 (2 letters), Southcot

Lubbards Close: 3, 4

Main Road, Tower Park: 5, 10, 36

Maine Crescent: 25

Malyons Lane: 1 (3 letters), 4, 5, 6 (3 letters), 9, 11, 14, Joloma, Mulsanne, The New Bungalow

Mapledene Avenue: 1, 16 (2 letters), 19 (2 letters), 28, 32 (2 letters), 36, 40 (2 letters), 42 (2 letters), 43, 47 (2 letters), 49, 51 (2 letters), 57, 61 (3 letters), 65 (2 letters)

Marshalls Close: 3

Mayfield Avenue: 12, 16, 32, 33, 41a, 44, 50 (2 letters)

Meadow Road: 2, 4 (2 letters), 11

Monksford Drive: 1, 3, 4, 6, 14, 20 (3 letters), 23, 28, 30 (2 letters), 34 (5 letters)

Montefiore Avenue: Catford

Norman Crescent: 6

Oakleigh Avenue: 1, 6, 7, 11 (7 letters), 16, 27, 28 (2 letters), 30, 31

Padgetts Way: 1, 2 (2 letters), 11 (2 letters), 15, 17, 18, 20, 21, 24, 29, 31

Peregrine Gardens: 1

Pevensey Gardens: 8 (2 letters), 19

Philbrick Crescent West: 69

Pinewood Close: 5

Pooles Lane: 2, 4 (11 letters), 5 (5 letters), 7, Craigleith (2 letters), Crouch View House, Halliards (3 letters), New Era (2 letters)

Queen Anne's Grove: 8

Queens Avenue, Tower Park: 1a, 14, 24, 43

Riverview Gardens: 3 (6 letters), 9, 10 (2 letters), 11 (4 letters), 15 (3 letters), 16 (4 letters), 17, 18, 21, 23, 24, 27, 28, 34 (2 letters)

Riverview Walk: 3, Flat 4, Flat 5

Rydell Close, Hullbridge: 2 (2 letters)

Salisbury Close: 50 (2 letters)

Shakespeare Avenue: 29 (2 letters)

Shangri-La Park: 9

South Avenue: 1, 2, 4 (2 letters), 5, 6, 7 (2 letters), 10 (3 letters), 12 (3 letters), 14, 17 (2 letters), 24, 27, 47

The Avenue: Brakens, Bruneval (2 letters), Denlee (2 letters), Ganarimo (3 letters), Longport, Starlings (2 letters), Tahiti, 21, 23,

The Drive: 1, 3, 10, 17, 21, 44, 46, 53, 54, 57, 62, 67, 68, 78 (2 letters), 80, 81 (2 letters), 83 (4 letters), 95, no number

The Esplanade: Creekview, Heronhoe, River Breeze

The Limes: 14

The Priors: 1 (2 letters), 3 (2 letters), 4, 5, 7, 9

The Promenade: 1, Ambleside, Witsend

The Ramparts: 35

The Walk: 7, 16 (4 letters), 19 (4 letters), 21 (2 letters), 24a (2 letters), 26 (2 letters), 27, 37, 38, Oak Lodge (6 letters)

Thorpedene Avenue: 7, 10 (2 letters), 11, 22, 27, 28, 42, 44, 48, 50

Tillingham Way: 39

Towerside, Tower Park: 12, 14 (3 letters)

Trinity Road: 25

Truro Crescent: 20

Tyndale Close: 11 (2 letters), 13, 17, 19 Tynedale House, Flat 31 Tyndale House, Flat 37 Tyndale House (2 letters)

Wallace Close: 1, 9, 18, 21 (2 letters)

Warwick Road: 32, 122

Waxwell Road: No number, 2, 6, 8, 22, 31a, 49, 50 (2 letters), 51 (2 letters), 53 (2 letters), 54, 56, 59, 67, 69, 78, 85 (2 letters)

Wellington Avenue: May Cottage, The Groves (2 letters)

West Avenue: 3 (2 letters), 6, 8, 10

Williams Green, Tower Park: 11

Willingale Avenue: 4 (2 letters)

Willow Drive: 1

Windermere Avenue: 10, 12, 15, 20 (2 letters), 22 (letters), 26 (2 letters), 27, 28 (2 letters), 29 (4 letters), 30 (3 letters), 33, 37, 47 (4 letters), 51 (3 letters), 52 (3 letters), 54 (2 letters), 56 (2 letters), 59 (3 letters), 60 (3 letters), 64, 65, 66 (3 letters), 68, 70, 72, 74 (2 letters), 76 (4 letters), 80, 86 (3 letters), 88 (3 letters), 90 (2 letters), 92 (2 letters), 94 (2 letters), 95, 96 (4 letters), 98 (3 letters), 100 (3 letters), 106 (2 letters)

Arterial Road, Leigh on Sea: 70

Bilton Road: 41

Church Road, Benfleet: 47

Cobham Row: 4

Cross Close, Benfleet: 17

Easton End, Laindon: 7

Goldfinch Lane, Benfleet: Westcott

Penny Royal Road, Danbury: Bay Cottage (2 letters)

Sandleigh Road, Leigh on Sea: 22a

Templewood Road, Benfleet: 16

Wells Avenue: 25

Willowpit Cottage, Station Road, Colchester (2 letters)

Anonymous: 18 letters received

And which in the main make the following comments and objections:-

Principle of the development/ Green Belt issues

- Totally unjustified development! Will destroy Hullbridge
- If this application were to go ahead, I feel it would cause an overdevelopment of the area.
- Poor design
- Poor layout/over-development
- More houses would ruin the character of the village
- Spoiling of existing residents village
- Not in keeping with the village.
- It will dramatically change the character of Hullbridge. There has been a slow growth in population over last decade but to now add a further 20/25% will have a major impact.
- We cannot afford to lose anymore farmland
- The effect of this proposed development will be catastrophic to Hullbridge.
- The addition of 500 houses is disproportionate. Far too many to be added to a village the size of Hullbridge, which has a large proportion of elderly people.
- 500??? Come on this expands this village into a town!
- This small patch of the South East hemmed in on three sides by water already has enough housing and people.
- Listen to the residents they do not want the village to become a town!
- The proposed 3 storey properties are not even in keeping with the nearby properties.
- Leave our village alone Essex is a dumping ground for the over flow of London, that is why Basildon was built years ago.
- We have lived in this 'village' for over 40 years and have seen it grow but by building another 500 houses it will become a town.
- It's a complete disgrace this area is being ruined for future generations when there is other options available which don't result in quality of life being ruined not just for current residents but ultimately the whole district as the current infrastructure cannot cope with the proposal.
- This area cannot sustain development on this scale. It is not feasible and will not improve the area at all.
- There are too many houses in this area, no one should be given planning permission, there are loads of new houses empty by Fitzwimarc, so if there was the need for them these wouldn't have been empty for months.

- The area is already over-developed and local schools and roads are struggling. This development would create considerable problems in an already busy, commuter town and is, in my opinion as a local resident, ill advised.
 - Lack of services.
 - Over-development, and the whole area does not have the correct infrastructure in place with regards to highways, drainage, schools, hospitals, it will only serve to congest the already over congested roads within the whole of the area.
 - Rayleigh cannot cope with the volume of houses, too many cars, people, no facilities to cope with this, doctors, schools, traffic/roads.
 - This many houses is not required in this area for the local populace.
 - The land is Green belt and it is NOT necessary to build on this land when there are undeveloped brownfield sites in the vicinity.
 - Do not think our infrastructure will cope, and will lose a lot of our greenery, will no longer be a village but a town.
 - This development will add to the already congested roads, schools, healthcare and other facilities. There is never any effective infrastructure included in the plans and there is always a flooding issue.
 - Over development, this will be a blot on the landscape and not integrated into the area, this is not the best place for such a development as it is greenbelt.
 - No need to build on the greenbelt land with such a massive development.
 - My main objection is and always will be the fact that you are building on greenbelt land.
 - I think the houses would not be beneficial to Hullbridge or the surrounding area.
 - The infrastructure is not in place. The amenities aren't in place.
 - Over development on unsuitable land which regularly floods.
 - There is no need to build on/in this village. We don't want to be a town hence living here and not a town/city.
 - Building new is not the answer especially on the few green fields this country has left.
- Changing a village to a town is not acceptable just because this country needs more housing. Adapt what you already have!
- Building on green belt is so wrong when there are lots of brown field sites that could accommodate new properties.
 - Even 50 new houses is far too many for this Village to cope with.
 - If planning is granted for these houses I take it all the fields around here will be able to be built on as surely what you allow for one field you have to allow for the rest.
 - I object to building on GREENBELT LAND.
 - This plan does not integrate the new residents into the village of Hullbridge. I object to you ruining OUR VILLAGE.
 - It seems to me there is some unscrupulous profit to be made out of GREENBELT land when BROWN field sites are available. I totally object to this building proposal.
 - I brought my house nearly 11 years ago and decided to move here as it was a small village and had a country feel.

- Farm land being used for non justified building.
- Hullbridge is a Village not a town, residents and the next generation do not want this massive expansion of houses and affordable housing with little to no parking or thought for current school doctors etc.
- Concrete taking the place of earth when building.
- If the government is saying you have to build, why are you not using brownfield land? Please go back to the drawing board, this area is totally unsuitable.
- It would increase the size of our village by 25% which is obviously overdevelopment.
- This area can not cope with 500 more houses, along side the 1200 planned for less than 2 miles away.
- Resources are stretched now if this housing is built it will be a grave mistake with grave consequences for us all.
- I object to the planning of 500 house being built in Hullbridge.
- Loss of village atmosphere.
- The development is not in keeping with the rest of the village. No justification for 500 dwellings or more . Infrastructure and flooding issues will get considerably worse. Disruption will be hell !!!
- Hullbridge will no longer be a close community which is very much family orientated.
- There are plenty of areas on the A127 that could be developed and would have better access to both amenities and location.
- This is a gross invasion of privacy, our garden is 25 ft from the boundary of the field.
- The majority of this proposal lies within 400 metres of an existing telecommunications mast and according to independent scientists can cause unacceptable health risks.
- Hullbridge has a high proportion of elderly people. The village has an average no. of people/dwelling of 2.3 (6,527 residents and 2,852 dwellings). With an ageing population, the appears little need for additional housing to home the local population. With an additional 500 dwellings, the average no. of people/home is likely
- Why have 3 storey buildings been located at the highestest part of Hullbridge. Surely the most sensible options are to have the taller buildings on the lower part of the development
- If a development (reduced in size) is necessary why could it not be located to the east of Hullbridge on area that is not typically known for flooding or in the potential traffic hotspot of the corner of watery lane
- We have lived in hull bridge for over 25 years and moved here for the village environment and general green fields feel of the place. This would disappear with the building development proposed.
- we rue the day we drive down the hull bridge road approaching the sharp bend at watery lane and see a housing estate instead of the beautiful green fields and open space which now exists.
- why if Rawreth needs more homes why not build them in the village of Rawreth?

- Also on a personal note we moved here to get away from large development to live in a village not a town so I believe I should have the right to remain in a village. Basic human rights.
- Contrary to NPPF – Communities
- By building 500 houses might mean another 1500 to 2500 people in Hullbridge.
- A significant part of the development is in Rawreth Parish, however the planned development site is really in Hullbridge, so will have no physical or social interaction with the Rawreth community (which is actually based some distance away). There is already a lack of integration within that existing community.
- we have lived in our house for 47 years and have all ways enjoyed our view, so we do not want to be looking on to a housing estate.
- In addition, views of the area from Battlesbridge would also be ruined with fields giving way to housing.
- I have lived in Hullbridge for nearly 50 years and the population has remained constant in that time. This fits a social and ecological balance.
- This once pleasant open and green district is being swamped by the numerous developments which our children and grandchildren will have to live with. I hope you are proud of your achievement!
- This land was purchased many years ago with the promise from yourselves it couldn't be used for houses. Whoever purchased it is making a fortune out of selling it off to the above and I suspect another country. The whole situation is corrupt.
- We feel smaller groups of houses across the Rochford District would be better than large groups. This would be fairer on everyone.
- There was overwhelming condemnation the last time an application of this size was discussed.
- These estates you want to build are in Rawreth Parish. You're upsetting 9000 Hullbridge residents for the sake of 500 houses. We pay tax and vote.
- Many properties in Hullbridge have a very pleasant aspect which is probably why they moved there in the first place. With this 500 house development these properties would lose that aspect.
- The environmental impact on Malyons Lane and Winderemere would be horrendous.
- Affordable Homes - due to the high costs of developing this site the developer will not wish to provide affordable homes in accordance with current planning guidance.
- The inadequacy of the highway infrastructure and this development along with other proposed developments feeding into Rawreth Lane will inevitably enable developers to place pressure upon the local planning authority to support a renewed 'outer Southend Bypass' proposal that would destroy the green belt heritage of the district and open the door to further development in the green belt.
- The only winners will be the developers who will be able to walk away once the development has been completed and leave others to pick up the bill for problems that will occur. The developers with their money locked away in their registered office in a Gibraltar tax haven will be more than happy. As for

those living on land that floods they will be the ones to pick up the cost of high property insurance.

- I have subsequently learnt that the dwellings in the proposed development will not have garages - why is this to be so.
- The development has three storey buildings and flats that are not in keeping with the bungalow chalet style of the dwellings as you enter the village gateway at Coventry corner.
- It appears from the application that three storey dwellings are proposed in order to increase the minimum density of 30 hectares to an average of 35 hectares which will over develop the site.
- The development would *fly in the face* of the local authority green belt and planning policy and would tend normal minded people like us to conclude that the council considers the outline planning application to be a paper exercise with no merit.
- The proposed development will take place on green belt land, which benefits from natural beauty and forms the habitat of many species of wildlife, which will be affected and possibly be destroyed forever.
- If this development is given approval, our calculations suggest that there is the possibility of at least a 90% increase in the population with corresponding increase in traffic. Hullbridge will, in population size, no longer be a Village but the second largest Town in the District without the amenities and services of neighbouring towns.
- With regards to the proposed social housing of 140 dwellings, I understand that there is only a need for 44 in the village.
- I gave up on the Presentation afternoon I visited after being told that "everyone would walk to the doctor's, the school, the shops etc etc and there would therefore be little extra traffic in the village and ,also told, that there would be a big drainage ditch dug to prevent ALL of the flooding" Clearly the people of Hullbridge are not considered to be very bright and this high handed dismissal of concerns is all over this application.
- Policy H2 states 250 houses 2015-21for Hullbridge. The important section is "Prior to this time, Green Belt land within such areas will be safeguarded. So as no public statement has been released by RDC to say that the 5 year housing supply will not be met. No approval of the second tranche should be approved till 2021 or until RDC can prove the 5 year housing supply can not be met.
- Rochford District Council states that a DPD should be justified, meaning it must be founded on a robust and credible evidence base, backed up by facts (Rochford DCAS, DPD, Notes and Representation Form, Para 3.1 (Soundness)). There are various unanswered concerns that Hullbridge residents have. Residents of Hullbridge have the right to see these questions comprehensively addressed by Rochford County Council before the SER6 development can be considered 'justified'.
- Local residents have not been properly consulted by Rochford District Council, most of the information regarding this development has come from local residents.

- The decision to build on greenbelt when ample brownfields sites are clearly available should be subjected to a public enquiry. Who is benefitting from the loss of this amenity?
- The proposed sites, I believe, are Green Belt - why are green belt areas now being built upon. Green Belt means no development. The areas were farming fields - if development is constantly taking farming fields how can we sustain our independence for growing crops and farming animals. We would become totally dependent upon food from abroad. Not a good idea.
- The proposed site would not allow interaction with the community of Hullbridge - the site would be isolated - an island. There is no benefit from the proposal for any of the residents of Hullbridge.
- The reason we purchased our property was the outlook to the rear, now we find out we could have 500 3 storey homes to look at while in our garden, while in our kitchen, while taking a shower! Why should I lose my view.
- No one in Hullbridge wants these houses to be built so you should put an end to this and move onto somewhere else and make someone else's life a misery.
- I am aware of the need to provide additional housing within the district, and there are many aspects of the proposed new development which will bring benefit to the existing residents of Hullbridge. However, unless the problems of infrastructure, highways and flooding are properly addressed it will cause major inconvenience regarding access for both existing and new residents and severely exacerbate flooding and travel problems.
- No to any build! We have no roads, no drains, we do have flooding!
- This application is ludicrous when there are no plans to improve the infrastructure first, I suspect this is because it would prove to costly. the roads will be unable to cope with any extra traffic, I accept more housing is needed, brownfield sites need to be used first. I have a friend who lives in house with a piece of land adjacent to her bungalow and they have applied to the council on a couple of occasions for planning to put affordable housing on, this has been refused and they were told to put allotments on it, how absurd when there is obviously space for housing.
- Surely there should be an emphasis to build instead on brownfield sites which are plentiful around the south east of England.
- Mark Francois, MP for Rayleigh and Wickford, has lodged his objection to the proposed development of the site.

Consultation

- The amount of consultation with the community by the applicant is laughable and is contrary to NPPF 188.
- A complete lack of proper consultation, culminating in a debacle.
- The Planning Inspector who vetted the Draft Core Strategy was not in possession of all the facts and consultation for the entire proposal was woeful in the extreme. In fact, looking through the document, it would appear that the whole Core Strategy is based upon flawed premise: expediency being the name of the game as opposed to seeking the genuine concerns of residents.

- The application clearly does not have local support - at all levels. There has been a complete lack of consultation with the local community. There is also a lack of clarity on who the principal developer will be.
- This project is a major development which affects the whole Hullbridge community and as such, must be communicated to the whole community of Hullbridge. Why have you only sent your letter to the households west of Ferry Road and why have you not notified the Hullbridge Residents Association (HRA)? This is not proper consultation or communication as you are obliged to conduct. Why also were you pushing this deadline so hard, which was well in advance of the pending court decision, unless you were aware of the decision in advance or were told to ignore it? I challenge your right so to do.
- The applicant in my view it failed to work closely with those affected despite holding 2 exhibitions that have failed to provide any feedback prior to this submission on any of the matters raised. They have not worked with the residents of Hullbridge fully.
- The total lack of consideration for the views of existing residents of Hullbridge.
- All items have been raised repeatedly to the developers who rightly direct all parties to contact Rochford Council. Rochford Council in turn have been notable by their lack of comment, lack of presence at debates, failure to send representatives to the local meetings with developers despite repeated request and apparent disregard for opinion of the local population.
- Hullbridge residents were not consulted about this development. Hullbridge residents do not want this development. Rochford District Council should listen to its residents and seek more appropriate sites for development and not attempt to build on our green belt.
- Lack of response from applicant shows they had no intention of working with the community but just providing lip service to comply with NPPF 66. Working with the community means providing feedback and responding to questions in ALL forms of communication. This they have not done. In my view they have not complied with NPPF 66.
- I believe R.D.C. anticipates the response from the residents as being one of resignation, therefore, this development is being seen as an easy option.
- One of the experts on hand at the exhibition was from Suffolk – what on earth would he know about the problems experienced by the people of Hullbridge on a regular basis?
- Despite holding two exhibitions where the applicant has had plenty of opportunity to work with the community, they have demonstrated by their lack of response to me and my various emails that they had no intention of working with the community but just providing lip service to comply with NPPF 66.
- Working with the community means providing feedback and responding to questions in ALL forms of communication. This they have not done which is also evident in their application especially in the documentation “Community Involvement” and “Planning Statement.”

- 98% of the people in this village objected to this once they actually found out what was going on and you seem to be ignoring this the whole thing stinks.
- Residents have not been given appropriate notice to enable them to object to this development.
- Meetings have not been widely publicised, often taking place in summer holidays when residents are on holiday. I believe that this invitation to submit comments on the application has been put out in the run up to Christmas which is one of the busiest times of the year for people with young families in the hope that it would go unnoticed or that residents would not have time to object.
- A poll of Hullbridge residents carried out during the RDC plan showed 98% against development.
- For reasons known only to themselves RDC Councillors and in particular the Cabinet members chose to ignore the will of the people.
- Rochford District Council has ridden rough-shod over Hullbridge residents' opinions, dismissing out of-hand objections that were voiced on the rare opportunities afforded to residents to enable them to air those views.
- Hullbridge residents do not want this ! But no one listens to the residents!
- Please explain your meaning of the letter heading of "**Consultation on a Planning Application**".
- Why the Chairman of the Residents Association, who is also the Stakeholder and Representing Agent of Hullbridge, as noted above, was not given due information of this application.
- Common courtesy should have prevailed, to await the court verdict before accepting any planning application in respect of this **Major Development**. Your actions have left the population being suspicious that the verdict is a foregone conclusion in your favour. Can you prove that democracy is preserved by these actions?
- According to this letter, **consultation** is not allowed. We have written evidence that the Hullbridge residents would be fully consulted at every stage of the planning procedure, please point out where the localism Act excludes consultation and what you mean by the word **Consultation**, and can you explain to us why you consider Hullbridge residents are not worthy of **Consultation** contrary to many statements made.
- Why is Mr. Carleton, the Chair of the largest group of the District, completely ignored from inclusion of this most important information.
- The Hullbridge Residents have consistently provided you with evidence that the issues of Flood, Traffic, General Congestion, Watery Lane & inadequate existing infrastructure are the most important issues concerning Hullbridge, but our voices have fallen on deaf ears.
- I will assume we will be afforded the 8 weeks consideration time normal for a project of this nature and size which will also allow you to correct your error of not communicating with the whole village.
- The supporting documentation such as traffic survey and flood risk etc. are so academic they are almost impossible to read and in my opinion deliberately so. They require a summary, written in simple English for everyone to understand. I request that you send such summaries to all interested parties.

When I have understood the documentation and had sufficient time to study them I will be able to respond more fully.

- I hope the concerns of residents will be listened to and not ignored by the distraction of the vast amounts of cash that must be involved in such a large project? Why is this application from an offshore company?

Highway Issues

- Traffic generation/access
- Parking
- Insufficient infrastructure to cope with an extra 500 homes.
- It would put more traffic on the roads, which are already a nightmare!
- Concerned due to inadequate infrastructure, increase in traffic.
- I cannot see how 500 new homes are going to do anything but add to the already considerably poor traffic conditions around Hullbridge, Rayleigh and Hockley.
- The traffic would be unbearable. We already had a summer of discontent in 2014 whilst Watery Lane was closed. This resulted in over one hour extra commuting time each day to journey to and from work. Huge traffic jams queuing from the A130 into Hullbridge. The effect of another 500 properties with perhaps a 1000 cars is unthinkable.
- The, what only can be described as nightmare, that occurred earlier in the year with the closure of Watery Lane illustrates how close to breaking point the road infrastructure is. A journey that should have taken 10 minutes became one of an hour and led to numerous late arrivals at work for me.
- The proposed 500 houses with perhaps an extra 1000 cars seems to me to be a recipe for disaster and for more regular problems.
- Without significant support and infrastructure investment local residents will suffer reduced services and increasing traffic problems; this must be included in conjunction with proposed development and funded by developer.
- Local roads are already overloaded at peak times and this development plus others in the district will only increase that problem.
- I have lived in the village for over 20 years, the traffic has got much worse as years have gone on.
- Over development of an area that does not have sufficient infrastructure to support current population and traffic levels given even slightly adverse conditions let alone adding a further 500 households to the mix.
- The roads are constantly gridlocked.
- The roads are not suitable for the amount of traffic that this development will incur.
- The proposed new roundabouts are in the most illogical positions.
- Attempting to both exit and enter our area is becoming more and more frustrating and time consuming, for working people and school children alike. More vehicles on our roads would cause utter chaos.
- The houses will bring too much traffic on the roads around Hullbridge village and the infrastructure around Hullbridge, Hockley, Rawreth will not be able to cope.

- Access in and out of the village will be chaotic with too many mini roundabouts added to the existing roundabout at Ferry Road, all within a few hundred yards of each other. This problem will be exacerbated by the additional traffic from all the other developments within the area.
- When Watery Lane is closed due to flooding, traffic jams are currently a regular feature. This proposed development will only add to the problem, especially as it will be built in the flood risk area.
- The traffic into and out of Hullbridge is horrendous now at peak times let alone when this happens! If Each house will have a minimum of 2cars this will mean an extra 1000 cars on the road!!!!
- The introduction of the SER6 development will lead to an additional 735 cars being used in Hullbridge and the surrounding roads (calculated by multiplying 525 houses by 1.4).
- Every evening the east west routes are already in gridlock, we need less houses and cars in this area not more.
- The infrastructure of Hullbridge is not sufficiently well developed to accommodate such a large increase in the population without impacting negatively on our residents' lifestyles.
- The extra traffic will cause massive congestion on our roads. It is bad enough trying to get in and out of the village at peak times.
- Rawreth Lane is a nightmare at rush hour.
- You need to listen to the residents and try travelling the roads of Hullbridge your self when one road is blocked.
- The infrastructure of Rayleigh/Hullbridge is currently not fit for purpose and traffic is already at an unacceptable level in these areas. Adding yet more homes will make this worse and intolerable for residents, especially on rawreth lane, London rd, 127 .
- Rayleigh cannot cope with the amount of cars travelling through our area as it is. Another 500 homes will mean a minimum of another 500 cars using Rayleigh for access to Hullbridge.
- Rayleigh is constantly gridlocked.
- This development will cause gridlock to the area.
- Traffic volumes are already high around this area.
- The local infrastructure is not able to cope with the amount of residents and traffic now. I vehemently object to this application.
- Far to much traffic to add to the additional planned increase on Rawreth Lane.
- Local Road Network cannot sustain this volume of traffic.
- To have a proposed major entry/exit point on the brow of a hill, namely to junction of Malyons Lane and Ferry Road is complete nonsense. If no potential accident assessment has been carried out at this site, may I ask why not?
- As a resident of Hullbridge since 1982, and a Driving Licence Holder Since 1998, I have an intricate knowledge of the road network in Hullbridge and the traffic issues that are present. Any observations in this representation that have not been based on credible documented evidence have been based on my own personal experience of daily use of the local roads.

- The additional traffic will have a negative impact on the quality of life and community cohesion of Hullbridge residents (particularly in the vicinity of Malyons lane). Previous studies in the UK have discovered that the number of friends and acquaintances on a residential street, as well as the extent of individuals home territory tend to decrease as vehicle traffic increases. Other notable outcomes from the research include the finding that the frequency of stationary, street-based recreational activities is reduced as traffic flow increases, and that individuals perception of the safety of their neighbourhood may be disproportionately influenced by the amount of traffic on their street of residence, especially affecting the degree of independence granted to children". (Driven to Excess: Impacts of Motor Vehicle Traffic on Residential Quality of Life in Bristol UK, April 2008, page 4 Joshua Hart (MSC Transport Planning)).
- Ferry Road has narrow pavements, lots of pedestrians, many of whom are schoolchildren and already caters for far more traffic than it was ever designed for.
- Lower road is already horribly dangerous (please ask about the number of accidents, I have witnessed many) .
- There is only one permanent road in and out of the village for those of us that have to do the work commute every day.
- We can not get in or out of the village as it stands at the moment.
- There are no roads to cope with the extra traffic.
- No planning for new roads or infrastructure.
- Traffic -the roads will not cope without a new infrastructure.
- Volume of traffic from 500 houses will be horrendous.
- Another 500+ cars will be ridiculous, we do not have the infustructure to cope with this. We strongly object.
- I've lived in Hullbridge for 10 years. In the last two years or so there has been a noticeable increase in traffic on the roads In this area.
- There have been many occasions when I have been unable to leave or return to the village without delays caused by a heavy build up of traffic for no apparent reason.
- I feel building extra houses will change Hullbridge from a village and the extra traffic will make it impossible to come in or go out of Hullbridge. I already endure long delays coming and going from Hullbridge but it seems worth the sacrifice to live here.
- I wish one of you people who are considering this plan to live in Hullbridge for a while and experience the traffic and misery we have to put up with with now. It's ludicrous. I have not read anything that gives me any confidence how planners are going to ease all the problems in this area. It is an issue that keeps being ignored.
- This area just won't cope with any more traffic. It took me an hour on the bus to get to Rayleigh station on Mon 24 Nov because Watery Lane was closed.
- The traffic has become a nightmare which makes it very hard to exit our property and we live near the doctors surgery which has insufficient parking for patients and cars constantly obstructing access to properties and parking on the bus stop.

- With an extra 500 houses comes the minimum of an extra 500 vehicles attempting to get in and out of the village during rush hours.
- Lorries already thunder along Lower Road with total disregard for pedestrians as there are insufficient pavements.
- Roads cannot handle heavy traffic now yet the plans show no new or replacement roads!! Crazy idea.
- I can't believe you are considering building so many houses when the roads can't cope with the amount of traffic at the moment let alone with a thousand more cars at least that will be around at rush hour.
- Traffic is very bad at the best of times during rush hour so adding extra on the three roads in or out of the village is suicidal.
- This will cause catastrophic road congestion in this area.
- These roads can not cope with any more cars on the road and by putting houses nearby brings cars!!!! So I am saying a big NO
- The Fairglen Interchange suffers from long tailbacks DAILY mid week; and 500 houses with potentially 1000 cars will cause gridlocked traffic and chaos.
- If you build then the whole of this part of Essex will be gridlocked.
- Ferry Road has high traffic volume as it is in effect a closed road with the river at the end. 500 homes could bring anything from 800 to a 1000 more cars to the village leading to an immense increase in traffic along the main road and its access roads.
- The existing junction at Hambro Hill and Rawreth Lane will become gridlocked
- Have you ever driven along Watery Lane in the dark during rush hour? There will be a casuality there soon without doubt. Any planning consent of this size MUST include significant road access improvements.
- I sincerely urge all those involved in approving this application to drive both access roads during rush hour and decide how many lives will be lost without infrastructure upgrades. On your conscience be it.
- The addition of up to 1000 cars is obscene.
- The proposal to incorporate an extra 'Vehicle Access Roundabout' onto Lower Road is ill-thought out as the only place it could go would create even more tail-backs both in and out of the Village, access to which is by ONE MAIN Road.
- The Core Strategy and Allocation plans are flawed in that they do not have specific plans for road infrastructure commitments from ECC.
- It would absolutely be in every ones interest to make the access to the development from Rawreth lane as this would prevent traffic from going any where near our village.
- Children's journeys to school are affected making the children late for classes, hospital appointments missed.
- The primary access point onto Lower road at a known accident black spot is unsafe.
- Would the road be widened to make room for the cycle path?
- the secondary access is now coming out at Malyons Lane. The exit is below the brow of the hill and therefore has limited visibility for cars exiting.
- Malyons Lane is quite narrow and not suitable as the entry point to this large complex for 2 way traffic and large vehicles.

- Encouraging people to use bicycles to get around will not work as the roads will be deemed too dangerous. Nobody seems to walk anywhere leading to parking problems throughout the village.
- My husband and I have carers twice a day and they are frequently late due to traffic problems in the area.
- When I asked a representative of the company overseeing the application what they intended to do about upgrading Watery Lane, he informed me that this would not be in the planning application and that Rochford Council had said that they wanted to discourage motorists from using this road.
- As there is no railway connection in Hullbridge the traffic trying to leave the village at peak times is very heavy.
- Living facing the main Hullbridge Road at Coventry corner, I have seen a tremendous growth in the traffic, both resident in the village as well as through traffic using Coventry Hill. This through traffic contributes to the tailbacks at Ferry Road/Coventry Hill/ Watery Lane and reaches on to the junction at Rawreth Lane.
- The survey on which the traffic assessment was made is out of date (2010) and the recent survey was done at a time of very light traffic (around school half term) which is contrary to Essex Highways policy for conducting these surveys.
- If it is to be used in assessing the impact of this development on the surrounding roads, the traffic survey which was carried out on Hullbridge Road and Lower Road towards the end of last year is totally invalid for this purpose as it was carried out during a period when the schools were closed and is therefore not representative of the true situation. Any traffic assessment should also include not only numbers of vehicles but the length of time added to journeys (which is already considerable) during the rush hour where there are existing traffic bottlenecks eg Rawreth Lane/Hullbridge Road mini roundabout.
- One reason I took Early retirement was my car journey time to get to work and return had got intolerable and took longer. Rawreth Lane/ Hullbridge Road is the main route in/out and every working day was at a crawl. This has notably got worst in the last 5 years. Other alternative is Watery Lane provided it is open. Main problem is flooding and large trucks using as a cut through. My wife and mother in law will not use it as they feel unsafe when driving so will always use the main route. I have cycled Watery lane and was always relieved to get through it in one piece. There are always signs of broken glass on the road from clashing door mirrors and most probably not reported. Another 500 houses and +cars. Unthinkable.
- I object to the planning application on the grounds that insufficient consideration has been given to the increase in traffic from this development, and also major developments that are currently taking place in Hawkwell and Rochford.
- Public transport issue - only number 20 bus service and doesn't run into late evenings - only route out and into Hullbridge and doesn't give children options. Need more routes direct to Hockley way and Chelmsford.
- Buses are unreliable.

- I understand no plans have been made for extra buses. This will impact the village greatly with so many extra people living here should the plans go ahead. At peak times buses are already full.
- Cycleways and bridleways need to be included
- Footpaths run through the site and these need to be retained and upgraded to bridleways.
- Windermere Avenue will become a rat run. This is already a busy road as people park along it for the doctors surgery.
- The down side of this is that the road in and out of the village is heavily used by traffic as well as users from outside the village using Watery Lane as a cut through. The repair works to this road in the summer caused long traffic delays causing me to be late for work on several occasions.
- No Assessment of traffic flow was carried out when Watery Lane was closed. It is a Priority Route 2 and floods regularly. It has been closed for 3 days (causing major disruption) since this application was put forward, but no solution has been put forward to alleviate this cause of congestion. The assessment provided is not acceptable as it is out of date and the assessment mentioned for October/November 2014 is invalid.
- How will the increased parking requirements for the Ferry Road 'Hullbridge Medical Centre/Clinic' be addressed?
- I cannot believe this is still going on, I live in Malyons Lane which is going to be hit by the extensive traffic.
- Since 2002 Ferry Road has become increasingly busy, particularly in the spring, summer and autumn when visitors come to the River Crouch.
- From looking at the plans on the council website there will be two new roundabouts, one where watery road joins Hullbridge Road/Lower Road, and the other between Watery Lane and Budgens/Ferry Road roundabout. So in a very short stretch of road there will be THREE roundabouts which would cause traffic to become congested with tailbacks.
- Perhaps Rochford Councillors are fortunate enough not to have to use these roads during these busy times but I am sure you are all aware of these problems and would appreciate you giving some very serious consideration to not approving the planning application for 500 dwellings in Hullbridge and therefore increasing the already serious traffic congestion in and out of the village.
- THE TRAFFIC REPORT OF 2010 IS OUT OF DATE. I REQUEST A NEW ONE.
- Because Hullbridge Road is too busy and dangerous I ride my bike along the pathway.
- The traffic as it stands getting out of Hullbridge in the morning between 7.30am and 8.00am is appalling and this is before a new development is built. To get to work before 8.30 I have to leave my home at 7.15 to get out of Hullbridge before the backlog of traffic builds up.
- Instead of complying an out of date traffic survey in the summer holidays, why do you not rent a place in Hullbridge for a few months and try to drive into London by car each day, you would receive a true reflection on the congestion then. I strongly object to this proposal of 500 houses being built and would

suggest you seriously consider the impact this would have on family life of the residents already living in Hullbridge because of the additional time spent on the roads getting to and from work each day.

- One access road is entirely unsuitable for busy traffic, being narrow, twisty and prone to closure due to flooding. The main route is already suffering from long tailbacks during busy times of the day, and we have almost given up driving out in the afternoons due to the traffic. All of which will, during the development period, be multiplied a hundred times by the construction traffic. We feel very strongly that this proposal is extremely deleterious to the district.
- The very least you need to do is to improve the flow through the right hand turn at the start of Rawreth Lane and to upgrade Watery Lane by widening it and sorting out the flooding issue.
- The suggestion that car sharing will solve transport links is a non starter - not everybody leaves to go to work or return from work at the same time - particularly commuters. More buses will therefore be required also how will the additional children get to senior schools.
- Road congestion seems to have been totally ignored - during school run times and Saturday mornings lengthy tailbacks exist along Hullbridge Road.
- What about the upgrade of unadopted roads - or is it the intention to make Hullbridge into a two class urbanisation??
- The Hambro/Rawreth lane roundabout. The infrastructure cannot cope with current traffic levels without adding an additional 500 + vehicles to the road system. THERE ARE NO FUNDS FOR THIS JUNCTION TO BE IMPROVED OR COMPULSORY PURCHASE ORDERS MADE IN THE NEAR FUTURE.
- To the right of the proposed junction at the Site Access & Lower Road is another proposed Local Play area right next to the highly congested Lower Road, this is another accident waiting to happen and no common sense has been considered.
- The Maylons Lane access does not comply with Essex Design Guide Type 3 Feeder Access Road which states a minimum of 5.5 meters wide not 4.8 meters as shown on the application together with speed restraint measures and 2 meters wide footways each side of the carriageway.
- We cannot accept the applicant's traffic study that an average of only 11 cars queue and only take three seconds each to negotiate the existing mini roundabout.
- Our five year old daughter uses the Our Lady of Ransom School bus in the morning, therefore every weekday I see at least thirty cars.
- Over the last year there have been many occasions when it took over an hour to exit the village when Watery Lane was closed due to construction work or flooding resulting in people being late for work and children missing valuable school time.
- The two roads mentioned above Lower Road and Watery Lane have, since the building of the new A130 from the Rettendon Turnpike to the A12, become a major route for vehicles heading for the M25 and London from Hockley, Rochford, Southend and all places east of Hullbridge wishing to avoid the traffic nightmare that is the A127. Joining this steady flow at rush hour from the roads within Hullbridge itself is already extremely problematic. Five hundred additional houses would easily equate to

an extra one thousand vehicles. If only a fraction of these additional vehicles try to exit or return to Hullbridge during the rush hours it would make an already bad situation much worse.

- Over the 30+ years that I have been a resident in the village there have been numerous times that Watery Lane has been closed to try to rectify the problem but no solution has been found so the flooding continues.
- Ferry Road has the water mains under the road, heavy construction traffic will cause the road to sink and damage the water pipes beneath. The village will lose its water supply!
- We are going to become GRIDLOCKED. I invite any planner to accompany me on any journey to and from my place of work in Chelmsford as does my colleague invite the same to her place of work in Basildon to understand fully our concerns.
- Maybe a nice new 2000 space car park – has that been considered on the flood plains!
- With the closure of Watery Lane due to flooding, traffic has no other option than to use Rawreth Lane to access the A1245, Chelmsford, Basildon and London.
- Does the traffic survey take into account the latest ECC decision on home/school transport? If parents cannot cover or will not be prepared to cover the potential cost of about £300 per child to get to Sweyne School, then this could be a potential considerable increase in traffic at both ends of the school day.
- The only conceivable benefit of the proposed building development as far as I am concerned is that Windermere Avenue would be made up to adoption standard as part of the development works.
- When bridge strengthening was taking place in Watery lane the traffic build up could take 40-60 minutes just to get from Ferry Road to Rawreth Lane a distance of appx. one and a half miles.
- The plans on the website indicate that none of the new houses will actually front on to Windermere Avenue but instead will be serviced by roads within the Estate. Indeed, it looks very much like it is intended to insert a greenery strip (no doubt publicly owned and maintained at taxpayers expense) between the new houses and Windermere Avenue which I gather is a common ploy used by developers to avoid any responsibilities and obligations that would go along with fronting on to an existing road.
- I can understand the developer trying to minimise costs but in so doing, even if all other pre requisites to making up the road could be met (which is highly unlikely once the development is complete), the existing residents of Windermere Avenue will effectively be deprived of the ability to ever having the road made up not least because they would have to bear the cost of making up both sides of the road thereby making it prohibitively expensive. As such, the existing residents will be condemned to living forever on a road more suited to the Middle Ages than the 21st Century.
- There is also the matter of the two pedestrian access points from Windermere Avenue shown on the Master Plan. Underlying plans show that there is more than sufficient room easily to convert these two pedestrian walkway accesses

into full scale access roads. With construction traffic access becoming more and more difficult as building work progresses towards the northern section of the site (due to the narrow roads and lack of parking on the Estate and the congestion caused by the proposed multiple roundabouts and pedestrian crossings on Lower Road), it does not take a genius to see that 'mission creep' will occur and that, no matter what RDC state or intend or promise at the present time, both of these access points will end up as full scale access roads into the Estate.

- As such, the residents of Windermere Avenue will end up with the worst of all worlds ie houses opposite instead of open fields and a road worse than it currently is. The Council should give a categorical assurance in this regard.
- Although being given assurances from LHC that there would be no additional vehicular access onto the site, the detail drawings show extensions of existing roads onto the site from Windemere Avenue, Harrison Gardens and the Priors. We have also found that the proposed Malyons Lane access does not comply with the Essex Design Guide Type 3 Feeder Access Road ie min 5.5m wide (not 4.8m as shown) together with speed restraint measures and 2 metre wide footways each side of the carriageway.

Drainage/flooding issues

- Insufficient drainage.
- According to the Environment Agency the site is at risk of surface water flooding in the 1 in 30, 1 in 100 and 1 in 1000 year events. As you are probably aware we are now experiencing the ninth storm event during this current season of 2015/2016 (9 in 1 year) this no doubt will become the norm due to climate change. Flooding is therefore going to be a major concern, amongst others, with this proposed development
- Because of the clay soil the area around Hullbridge is and always will be a flood area.
- Weather conditions have changed over the last few years, flooding is becoming a major problem in the village.
- Flooding is becoming more common.
- The proposed water pits will not be enough, they would be full continuously and of course overflowing adding to our already poor drainage here.
- We can no longer use our garden in the winter, the water table is so high it never goes down in the winter, with our pets not being able to use the gardens it has become a problem to many here.
- Further concreting of our area will cause even more surface water to come our way which is spoiling our homes, even our trees are dying of waterlogging here. You cannot stop the forces of nature.
- Hullbridge water table is so high being next to the river too, we have seen a major change here in the last few years and have even purchased sand and bags as we feel its only a matter of time before the surface water is so invasive it will enter our house.
- I cannot see where suitable study has been given to the "sumps" proposed on the site to hold back rainwater.....what becomes of the static water in drier times...my guess is it will stagnate and smell....also the chances are that

windblown rubbish and "vandal" dumped waste will be a constant problem for these areas

- Are these sumps going to have railings surrounding them to prevent children from falling in?
- Our property backs directly onto the proposed development and I am in no way convinced that enough investigation has been carried out to correctly assess the knock on effect of surface water drainage across the site and the impact on both the residential properties immediately surrounding the site and additionally the impact on the one main road out of Hullbridge (Lower Road).
- Further development of this scale in the village will only increase our problems, which of course is Spoiling Existing, whichever way you look at it.
- We have no surface drains in the unmade roads, the winter rains are now torrential, the local infrastructure is not coping now. No more Concrete here!
- Why build on Green Belt when you know it's going to flood. When it does happen I hope the people responsible will suffer as much as the people who are flooded.
- This increase in urbanisation will decrease the amount of natural soak away available and the planning application has not considered the knock on effect of this. I am concerned that the increased intensity of development in this area will give rise to land with a higher proportion of non-permeable surfaces, a problem which may be exacerbated by overloaded and out-dated drainage infrastructure.
- The houses are to be built on land which is subject to flooding and does not have sufficient drainage, adding to the issues faced in the surrounding area, this in turn will have the knock on effect of making infrastructure and transport links.
- As far as drainage is concerned, there is more evidence of overflowing than ever, as well as increased flooding.
- Watery Lane is not a road that can be relied on as a means of access in wet weather. It is frequently flooded, a fact that the authorities are reluctant to accept.
- Also building houses on a flood plain is desperate and short sighted, and will in the long term be seen as pure folly.
- This will add greater strain on drains and increase flooding to residents.
- Flooding is out of control in Rayleigh and Hullbridge. Slight bit of rain and both areas come to a grinding halt.
- In recent years Rayleigh has suffered floods on numerous which I believe is due the destruction of the flood plains. Building on more flood plains would be disastrous for the area.
- Too much concreting over London Road/Rawreth Lane has caused multiple instances of flooding in this area, who knows how much worse this will be if even more houses are allowed. I OBJECT ON SO MANY LEVELS!!!!!!!!!!!!!!!
- The area is flooded all the time, how would you ever get insured.
- A heavy downpour of rain closes Watery lane rendering the journey to and from work to a slow crawl and gridlocking all surrounding roads. This has to be addressed for the current population long before you even think of increasing the numbers using the roads every day.

- Why are you proposing to build so many houses in an area that is really becoming a high flood risk area.
- The area proposed for development floods on a regular basis.
- My back garden floods every time we have long periods of rain and last year, for the first time my whole garden - which is lawn, was under a foot of water and my garage flooded so I have additional concerns about the extra demand on drainage a new development would bring.
- Hullbridge is always affected by poor drainage and flooding.
- A creaking drainage system that relies on a water supply from the other side of the river, which left us high and dry a couple of years ago, without drinking water, when it developed a catastrophic mains leak.
- the tidal drain locks regularly shutting twice a day preventing back flow of river water and therefore preventing heavy levels of drainage from the land. This is not an area that will support a large increase in housing safely.
- The area is almost at sea level, the rivers nearby are tidal, flooding can only get worse.
- The sewerage and drainage systems need modernising and improving. Over all it is just a very poor choice for so many houses to be built.
- My back garden faces Windermere Ave and is also suffering a lot of excess water and I am concerned that our property would experience further problems if a housing estate was built so closely to us.
- Flooding and Traffic issues have NOT been sorted. This will cause utter chaos.
- Who will pay compensation to the houses that flood as a result?
- The proposals for managing rainwater are flawed. Whilst sound in principle they require that lagoons and ditches be regularly maintained. In discussions with the developers they have stated that this would be the responsibility of the householder or local authority. Experience has shown that householders and landowners fail to regularly maintain watercourses.
- I have heard from quite a few people in Hullbridge who have been turned down by various house insurance companies, who state that they do not supply cover as this area is deemed a flood risk. What impact will this have on the new housing. Will they also been turned down for insurance cover. Most properties next to the site do not have surface water drainage, they rely on soakaways.
- Watery Lane is used as a main thoroughfare and is often flooded as is the proposed building site where the fields are often covered with surface water
- I understood 2 number tanks were to be installed ? I have a question who will finance and maintain these tanks? And will Rochford council oversee these tanks are installed prior to build and this will not be a scenario of what occurred in FENITON east devon where WAINHOMES failed to install tanks and now district council have had to serve enforcement of notice on wainhomes? And with these tanks I would like to be convinced they will work as I understand they will have no pumping stations I believe it is achieved by internal and external pressure? Will this work on high spring tides?
- The development of the site is contrary to NPPF – Flooding No flood assessment of the area has been carried out - at the present time continued

periods of rainfall result in flooding to Watery lane and the lower end of Hullbridge road and the Lower road junction. When heavy rain coincides with high tides there is no drainage path for surface water until the tide recedes. Surface water run off from the proposed development on the elevated ground will result in additional volumes of water flowing south into this catchment area, and is also likely to affect the 'soak-away' drainage systems currently found to the North of the development area.

- No analysis has been done of surface water flooding within or around the development area after development.
- The nature of the soil, London Clay, means any development would increase the likelihood of a knock on effect of flooding to other parts of Hullbridge, this has not been considered.
- Most properties adjoining the site do not benefit from surface water drainage and rely on soakaways, no impact assessment of this has been carried out.
- Many of the existing homes in Hullbridge are on unadopted roads which do not have surface water drainage. No impact assessment has been carried out to determine whether this development will increase the risk of flooding to these properties although this would seem likely since it is a clay soil.
- Still so many of us live on unmade or unadopted roads which we are one. My husband along with others, in the sixties, built our strip. No help from the council, not even any rebates on our then council tax.
- Hullbridge was a mass of fields all covered in ditches. When building started a lot of these ditches were just filled in which resulted in some of the houses being underpinned. We have clay soil, which dries in summer leaving huge cracks. When it rains heavily it can then flood, which flows to the river. Lots of the land along the river is slipping back into the river.
- Every dwelling should be provided with correct drainage
- No analysis has been done on surface water flooding
- Our small garden floods every winter now. Please ensure it doesn't get worse. It could affect my foundations.
- If planning permission is granted and flooding does take place, who will be liable for the costs involved.
- During the storms of 2014, we noticed that the drainage system could not cope. Along with our neighbour we have installed electric water pumps to hopefully protect our properties from the insufficient water drainage system that Hullbridge has at the present time.
- I live on Abbey Road and my back garden backs onto these fields. The field at the back of my garden often floods when it rains, and I am very concerned that this development will make this flooding worse and the flooding will then effect my property and subsequently my insurance premiums. Will Rochford Council take responsibility for this?
- The protest is even stronger this year than previously after the awful disasters of last years flooding throughout the country. Please don't be a party to allowing folks to suffer in this way.
- What's being done about the rivers. Maybe give the residents a boat each for work.
- I understand that no analysis has been done on surface water flooding around the development area and I can advise you that my back garden regularly

floods (resembling Lake Windermere) each time we experience heavy rain. It has not yet reached my back door but often comes fairly close.

- The use of water tanks to resolve flooding - the proposed tanks have no guarantee of success. These have been used on a Hockley development and have not been successful.
- Drainage of the tanks to ditches in Watery Lane is not viable - this road already floods and the ditches are on the opposite side of the road to where the tanks will be. Therefore will there be tunnels under Watery Lane to access the ditches.
- To build on land that already floods and reduce the amount of drainage by erecting houses will only increase the level of flooding. The argument that there is only one major storm every 100 years again is illogical and unfounded - take the last 5 years for example there have been major storms every year!
- I can no longer live in this village due to the increased surface water flooding that's has forced me to relocate. I am a social housing tenant and couldn't obtain contents insurance due to previous surface water flooding and sewerage flooding issues. we were affected when the sluice gates closed because of high tide combined with heavy rainfall and sewers unable to cope during August 2013. It is worse during the summer months when the clay soil hardens. With additional building of 500 homes this will impact an already aged network of sewers. Many of which are taking surface water as the majority of hullbridge have unmade roads and little or no surface water drainage.
- It concerns me that the new access road to this development crosses exactly where the field floods. I believe the drainage system planned is not up to the job As it doesn't allow for the different factors that cause flooding in this area.
- The Southern end of the proposed development is the flood plain and should therefore not be built on. The proposals are underground attenuation tanks, by calculation using the likely impervious areas from the new development only, these tanks will need to be approximate 1250 cubic meters minimum which equates to 1,250,000 liters (275,000 gallons) of water which the applicant states will eventually discharge into an existing watercourse which will cause even more flooding. The siting of these underground tanks will also cause the existing ground water to back up further into the site causing the existing flood plain to become more extensive.
- In the center of the site there is shown a proposed attenuation basin next to a proposed local equipped area of play for children, this is an accident waiting to happen. In this regard it is concerning that no "common sense" has been considered.
- These basins will no doubt be full for the majority of time especially when calculated for a 1 in 1 year annual probably storm (three heavy storms in 2014 alone), together with the amount of additional surface water run off due to the extra impermeable surfaces from the development would also add to the volume of water in these basins especially as DEFRA are no longer introducing Sustainable Drainage Systems Suds Compulsory legislation.
- The surface water easement shown of Maylons Lane parallel to Elm Grove needs to be a minimum of 6 metres wide and requires a larger buffer to give the required sensitive interface between existing gardens and the new

properties. No buffer is shown between the existing properties in Harrison Gardens and the new development as advised by Land Holdings when they presented its exhibition to the residents of Hullbridge.

- On the 18th September my house had approx. 1ft of water, because all the surface water from all the big houses built on West Avenue flows down that road like a river.
- Essex County Council and the Environment Agency have not, at the time of the Core Strategy or now, prepared any flooding assessment of the area.
- It can be assumed, because this analysis had not been undertaken, flooding to other parts and properties in Hullbridge was not considered at the time of the Core Strategy and has not been a consideration since most properties adjoining the site do not benefit from surface water drainage and rely on soakaways.
- Before any planning permission is granted the NPPF legal regulations regarding flooding of water onto other parts and properties of Hullbridge as a direct cause of the proposed development need to be undertaken.
- Regrettably, even though they have the powers to require the landowners to clear and maintain the ditch, the Council has shown no interest in sorting the problem out over the years other than requiring one of the plot owners to insert a pipe during the ditch infilling which started in 1994. I have cleared such parts of the ditch over the years as I am able but with nowhere else for the water to go it has become a thankless task. My concern is that the developer will again design things purposely to avoid any responsibility for the surface water in this area. Water will still drain off the development land into the ditch after the new houses are built. At the very least the plans should be that the developer be required to pipe the ditch or otherwise provide for the surface water from both the development land and Windermere Avenue to be dissipated for there will be no other opportunity to do so.
- I live at the top of Coventry Hill my house is sitting on a large layer of clay which slows the drainage a great deal. You only have to walk in the local park to realise the water naturally drains downhill towards the river crouch from the village. The amount of non porous materials that would be used to build 500 new homes at a low part of the village will surely inhibit the natural drainage of the landscape or send a flow of water downstream towards battlesbridge which looks likely to flood whenever we have a downpour.
- This end of the site (westerly end of Windermere Avenue) is often waterlogged whilst the water is waiting to soak away into the ditch. In addition, the concrete strip road at the western end of Windermere Avenue was designed and purposely sloped to drain the water from the road surface into the ditch. Until he disposed of the land, the farmer rigorously maintained this ditch to ensure the fields were properly drained and it worked well. The new owners ceased all maintenance of the ditch. Worse, a number of the plot holders actually filled the ditch in to gain vehicular access. Initially the council required the first plot holder who filled in the ditch for this purpose to insert a pipe to allow the water to continue to flow. Subsequent infill's, however, were carried out without any piping.
- The council itself finally destroyed the efficacy of the ditch altogether by granting planning permission to the owners of No. 2 West Avenue to extend

the house directly over the ditch thereby blocking the flow of the water into the River Crouch permanently. The upshot of all this is that, during periods of prolonged rain, the surface water created has nowhere to go other than to spill out and flood the road. This in turn has caused deep potholes in the concrete to develop over the years which when covered with water is downright dangerous to passing traffic who are unaware of the underlying terrain.

- No analysis seems to be available RE consequences of water drainage after development completed...this should be carried out PRIOR to going ahead with the project. At present contrary to NPPF?
- One of the main link roads to the village the aptly named watery lane. This road has a short section that needs to be raised higher than the surrounding farmer's field that uses the road as a drainage ditch. If no one in a position of power to improve any infrastructure has not thought of raising the low section of watery lane to prevent it being shut and causing gridlock every time it rains or the snow thaws then how can we trust them to guarantee the potential of creating a future flood risk to the surrounding areas.

Air quality and pollution

- The air quality due to all this extra traffic would be detrimental to the health of the residents of Hullbridge.
- An air quality report should be required for Lower Road and Hullbridge Road, NO such report has been included to allow an assessment of the environmental impact
- Air quality needs to be monitored, there's a lot of asthma in the area.
- This development will cause even more traffic and pollution on lower road . We moved to lower rd for fresh air because my wife is a severe asthmatic.
- Does anyone care about the future dirt and noise we will have. Air quality will be badly affected.
- This increased traffic would have an impact on air quality and I would assume that an assessment would be made on the environmental impact.
- The footpath on the main road leading out of Hullbridge is also going to be used by school children travelling to Sweeney park as the council are stopping free transport. These children are then going to be exposed to horrific amounts of pollution as the traffic will be queuing to get out of the village on there daily commute to work.
- For the residents that back onto the development, how are you going to protect them against noise and dust pollution?
- The pollution created would pose a serious health problem for an already overstretched medical practice.
- Pollution through slower traffic waiting at the new roundabout junction.
- Traffic congestion will be caused whilst building works are carried out causing air pollution and additional noise pollution will impact all surrounding residents.
- Increase in traffic congestion and traffic pollution.
- Increase in traffic congestion and traffic pollution.

- Another 500 - 1000 cars in the village will increase the pollution to the area the council duty of care seems have fallen on deaf ears
- Noise and disturbance
- There will be years of building with noise, dirt and lorries trundling by our house.
- Addition of these houses is certain to have a noise impact on the community.

GP and school capacity

- This would cause traffic problems, schools overloading in Rayleigh, the current waiting time at the doctors being even longer.
- I had to wait almost 4 weeks for a doctors appointment in January, how can our doctors surgery cope with 1500 possibly 2000 more patients.
- No mention of expansion of the school to meet the demands of the increased population
- No mention of expansion of the medical facilities to meet the increased population.
- It means we will wait weeks for a doctor's appointment and face the possibility of our children not gaining a place at a local secondary school.
- This is a very nice village and we don't want any more houses it will affect our doctors, school drainage and flood the area even more.
- More strain on local schools and doctors surgeries.
- The doctors are running at full capacity now and it is becoming increasingly difficult to obtain an appointment. What will happen if these houses are built and there are 1000 extra people to accommodate?
- With serious medical conditions the lack of medical care appointments with increased population this is worrying.
- We also struggle to get doctors appointments, this will be affected more.
- Health facilities will be inadequate for the 2 or 3 thousand extra people that will be living in Hullbridge
- It is almost impossible to get a doctors appointment unless you book at least a week in advance, with at least an extra thousand patients it will be impossible to see a doctor within a month.
- The proposal of a part time Doctors surgery at the Dome is preposterous! Hullbridge residents can't even get a bus there!
- They closed park school down rawreth lane and built an asda in its place so where will all the extra secondary school children attend???
- We struggle as it is to get our children to school in Hullbridge, additional houses will dramatically increase traffic.
- The local school also would inevitably struggle to cope with more admissions, forcing parents to take their children to schools further afield, therefore reducing the amount of children walking to school and consequently increase the number of cars on the road even more.
- The schools are fit to burst, so how on earth does it make sense to add such a large number of houses in a small area.

- Rayleigh schools will suffer as more families move to an area with schools that are all ready over crowded.
- Schools are under pressure.
- No schools are being built to take the extra children.
- The schools will not be able to cope with the extra numbers, it is not sufficient to assess current availability when the impact will be 5 years after the development is completed. I draw your attention to the news paper article from the Daily Mirror in the early 70's when Hullbridge had the highest birth rate in the county. Due to a small development of starter homes built in the late 60's,
- Local schools (primary and secondary) will not be able to cope.
- The nearest secondary school is bursting at the seams, where are the children going to go.
- Schools are already full so where is the education of these potential extra children going to take place. There were two schools in the village at one time but this was due to the extremely high number of children, so high that the village was in fact named in the Guinness Book of Records as having the highest percentage of children per head of adult!
- School places will fall short and why should my children be screwed over from getting an A rated education.
- Local secondary schools are already oversubscribed and any residents on any new housing development would get priority for places as they would be nearer to both Swayne and Fitzwimarc. This would mean Hullbridge residents might not get places at their local school.
- Of greater importance though is a lack of Secondary school places. All the local schools are at full capacity (several with waiting lists), so where would the additional children at this development go to school?
- There has been a Baby Boom in recent years and this will work its way into the requirement for secondary school places in the near future. Since successive county councils have either closed local secondary schools (such as the Park School) or refused to acknowledge that there would be an increase of required secondary school places with the amount of housing developments approved and built in the adjacent areas to match the requirements of an increasing population.
- This is absolutely ridiculous, the infrastructure can't cope now. Why on earth doesn't the council listen to the residents.
- We have just two secondary schools which are creaking at the seams and over subscribed and Fitzwimarc requires desperate refurbishment.
- I object to this application as it will affect my children when applying for secondary school applications. I moved to Rayleigh 6 years within the catchment area to the schools to which I would like my children to attend.
- Secondary and higher education facilities. There are no plans for secondary schools to expand. This development doesn't cater for the 11-18 needs of Hullbridge children where Rayleigh schools are already oversubscribed.
- Part of the development is in Rawreth parish. It is not clear if the children who live here will be offered places locally due to their parish allocation.

- Allowing the development would result in an influx in the amount of children attending the school and would therefore affect the numbers in each class and this would be detrimental to the education of the children who attend the school.
- Whilst Riverside Primary School currently has places, it is not clear if there will be sufficient capacity for the future. Due to the schools current performance (hence the spare capacity) many parents are taking their children to other schools in Hockley and Rayleigh. This development will only add to that increase in road traffic.
- In addition the morale of the staff would be affected which again central government wish to avoid due to the amount of teaching staff leaving the profession because of the unacceptable numbers of children in classes.
- The NHS Constitution advises that all UK members are entitled access to NHS services, including a local GP, by law (The NHS Constitution, for England, March 2012). This Constitution will be in breach by the Local Authority under the current submission. Full details of NHS GPs in the local area that have capacity for an additional 1260 members, and are willing to enlist them, are required before the SER6 development can be signed off.

Youth facilities

- NO YOUTH AND COMMUNITY COVERED AREAS ARE INDICATED. Non compliance with SER6a.
- Poverty, financial hardship and limited access to extra curricular activities for social tenants who will be taking up the affordable home dwellings. Hullbridge is a village, to access a good supermarket and secondary schools you have to commute out of the village. There are no provisions for additional bus services to provide better affordable transport to families, who will need access to Secondary schools, after school clubs, youth facilities and sports centre and possibly out of the Rayleigh area as rayleigh is already oversubscribed.
- We haven't got any real youth facilities or sports facilities, no police station, no clinic, a doctors surgery it is already difficult to get an appointment for. Where will all these people go and do.
- There are few facilities for our existing village youth; I see no consideration for any in the proposed development application. If the project goes ahead with multiple builders, who will become responsible to provide these facilities?
- There are no provisions for youth services in the village.
- We were informed the large public open space NE of the development was likely to be football pitches to provide for youth facilities, as if we haven't got enough already at the existing Recreation and Sports club. If this is correct where is the proposed car park which will obviously be required to support this provision.

Emergency services and crime

- I have personally experienced difficulties accessing the emergency services when Coventry corner and watery lane have flooded. Thus resulting with further damage to my property with the delays.
- In the rush hour, emergency vehicles would not be able to get through.
- The Ambulance station at Southend Hospital was closed and merged with Rayleigh Ambulance station. The police would either have to come from Rochford or Rayleigh Police Stations.
- Having to deal with emergency calls throughout the Southend, Rayleigh, Hullbridge and other surrounding areas does the staff really need an increase to the already widespread catchments area.
- What will happen in an emergency ie with a major incident, flooding, emergency services getting through?
- The proposed vehicular access of one primary access point and one secondary is inadequate, particularly when considering access by emergency vehicles.
- Doctors/hospitals/emergency services - will they cope? NO! I agree some housing is needed but no way 500 were talking more like 50 and then no more.
- I would also believe there would be a increase in crime due to over population of the VILLAGE and the local police, NHS and Fire service staff is insufficient for the proposed population.
- Crime rate will rise, and we don't have the police resources to cope with this, we have no police presence as it is. The whole reason why i moved to this village was to give my children a better quality of life and education, where they can grow up in a safe, friendly environment.
- Of late traffic flow and the lack of adherence to speed limits and intolerance to other road users is at a dangerous level – one reason is the complete lack of police presence.
- We do not have a police station anymore and if these houses are used for council or social housing the crime rate will go up and make our own properties go down in price.
- Some of the people in Abbey Close and Abbey Road do not have a fence at the end of their garden which exposes us all to a greater risk of crime.
- There are no details of crime prevention on the plans.
- the fire brigade have not got enough time to do an inspection on my industrial estate how will they attend more houses.

Loss of property value

- I also am afraid that it will cause my house value to drop as no-one will want to live this end of Rayleigh.
- This is an absolute disgrace to expect people who have put money into their properties to expect them to have their properties devalued and a beautiful green piece of unspoilt land ruined !

- Our property backs on to the immediate site and we have contacted a local estate agent who has confirmed that our property will devalue between £10,000 to £15,000 due to loss of view, loss of light, loss of privacy and noise and development. A major purchasing factor for us was backing onto greenbelt land and if the development was to proceed we would seek compensation due to loss property value as well as the disruption not only during the building process but also the compensation for the above highlighted value.
- It's a peaceful area with low noise level if building was to proceed then the noise from cars and the residential houses would be dreadful our house would go down in equity.

Shops and services

- There are very few shops and services in Hullbridge with the doctors surgery amongst over things struggling to cope.
- Over development of the village will put unbearable strain on its limited services; one post office counter in the local shop, village school which has reduced its capacity considerably ,one doctors surgery which is already at maximum!
- NO NEIGHBOURHOOD SHOPS ARE INDICATED, NORE ARE INCREASED PARKING AREAS FOR THE CURRENT LOCAL SHOPS AND THEIR INCREASED TRADE. NO FINANCIAL CONTRIBUTIONS ARE INDICATED. Non compliance with SER6a.
- I had occasion to travel to Rayleigh last Saturday to go into the town, however when I arrived in the car park at the top of the high street it was full, I then travelled to the Websters Way car park where again it was full with many cars waiting to park. Result, I drove back home without my goods. This is now a common occurance so where are all these extra people going to shop.
- The Bank and the Police Station have gone, the Library has reduced opening times, the Post Office is of limited use, and the variety of shops have disappeared to be replaced by supermarkets and eating outlets, resulting in the need for more cars and congestion on the road, to travel to the nearby town.
- Amenities are hard pushed now to cope with the villagers so any proposed development would have to accommodate these which, in turn, will put us back to square one due to the fact that in time they too will become hard pushed to accommodate the now townies. I and my family, along with my neighbours and the rest of our Village object most strongly against this build.
- Malyons Lane is used for parking for residents and also as overspill for parking visiting the local shops as there is very limited parking along Ferry Road.
- I believe the effect on local commerce will be devastating, as deliveries will spend vast amounts of time in the queues that will obviously ensue.
- Where are the new residents going to work? There are not many local jobs as we are not near any large office or industrial sites.

Environment

- Loss of natural habitat would involve in loss of wildlife and wild plants. We have also seen bats in the area.
- Loss of trees and vegetation
- Areas of nature
- Protection of Wildlife
- It would appear that the grass verge which acts as a barrier between Lower Road and the Memorial will be removed when the road is altered. This would make the area less attractive and more dangerous for people who want to visit the site. This may not seem important to the council but many people use the memorial to lay floral tributes to their loved ones and is an important part of the village.
- Contrary to NPPF, RDC have not identified the size, tenure and range of housing that is required in our location and whether affordable housing is needed unless RDC are going to accept a financial contribution of equivalent from the developer due to the increased costs in building affordable and lifetime homes to meet Housing Association requirements.
- A river system that is very sensitive to any risk of sewage leak, having oyster beds. The bird life that can be easily disturbed.
- We will lose our natural surroundings, the wildlife, flowers, insects and grasses.
- Loss of ancient hedgerow and mature trees, creating a brick urban jungle distinctively separated from the main village.
- Protected and endangered birds are nesting within the development area.
- Loss of tall mature trees that are part of the gateway to Hullbridge village.
- SCREENING IS SHOWN TO MONKFORD DRIVE, THE PRIORIES AND ABBEY CLOSE BUT NOT TO MALYONS LANE, ELM GROVE, AMBLESIDE GARDENS AND HARRISON GARDENS. Non compliance with SER6a.
- The hedgerows are important because they have existed in excess of 30, more than 20 metres in length and which join other hedgerows and are shown on the 1780 Farm map in the Essex Record Office and on the 1840 Tithe map of the farm. A copy of the map is shown below.
- The applicant has failed to consider the hedgerows which is a requirement pursuant to the National Planning Policy Framework and the Local Development Plan. The application shows part of the hedgerows would be removed.
- We were also informed by LHC that affordable will not be sited in one location but spread throughout the whole site. It appears that this will not happen and the central unknown type of 3 storey dwellings in the high density area will probably be used together with the 3 storey units.
- As stated in the Archaeological Assessment the Local Authority's archaeological advisor at Essex County Council will require archaeological mitigation measures in advance of any development impacts occurring, assurance is required.
- It is noted that historic field boundaries within the site comprise undesignated heritage assets of local significance and it is recommended that the orientation and preservation of these historic boundaries should be

encouraged within the detail of the development proposals, this does not appear to have been incorporated, especially the Ward Boundary between Rawreth and Hullbridge.

- I submit that the hedgerows are protection under The Hedgerow Regulations 1997 made under section 97 of the Environment Act 1995.
- The Government has set targets for moving to zero carbon housing in this country by 2016. This is being realized in three steps firstly 2010 a 25% improvement was made in the energy / carbon performance outlined in the Building Regulations, then secondly in 2013 a 44% improvement was made, and finally in 2016 we need to achieve zero carbon. The Governments definition of a zero carbon home is one where there are zero net emissions from all energy used over one year. This means that energy need for heating, lighting, hot water and all electrical appliances in the house, such as TV's and computers, must be attained from renewable sources (i.e. burning of any fossil fuels).
- All new houses have an obligation to be zero-carbon from 2016 onwards.
- The ongoing impacts and disruption of the planned building work to local residents of the SER6 development will continue beyond 2021 [LDFA Submission Document, Para 3.159] which represents at least 8 years of their lives. During this time it is estimated that thousands of construction vehicles will need access to the development area.

Other

- Loss of view
- Residential developments should not be built adjacent to mobile phone masts as highlighted by recent study that masts cause excruciating pain for amputees .
- Loss of light
- Loss of privacy/overlooking
- Policy objection
- Not in accordance with planning policy
- I strongly oppose to the housing planned for our village. The distribution to us residents will be huge.
- Our roads and everyday life will be badly spoilt by these extra residents in such small lanes and flooding now.
- We have paid higher taxes than most to live in a Parish, giving village community, if we wanted to live in concrete jungle we would have chosen Leytonstone or similar.
- I cannot agree to the policy until the infrastructure regarding roads and flooding have been resolved, Watery Lane is permanently usable, problems regarding schooling and medical facilities have been resolved.
- Rayleigh cannot cope and will become simply gridlocked impacting ok local businesses and residents.
- A small NE proportion of the site does not form part of this application with no explanation why. Does this mean more dwellings in the future.
- My insurance has already doubled in price due to flooding in my road, which I was unaffected by, but it is post code that counts.

- Essentially an attempt to 'dump' 500 new houses wherever the pin landed on the map.
- If this development goes ahead I will put my home up for sale as will many others meaning that the need for 500 homes might not actually be there anyway.
- I hope to receive a confirmation of my objection as stated this may be a objection that won't be registered.
- Lack of any local understanding environmental impact to surface water.
- Totally support Rayleigh Hullbridge action group motion to stop these houses.
- People are already becoming stressed about the development. RDC have proved that can't be trusted with selecting sites and listening to residents concerns so I believe no decision should be made to after the general election. There are many reasons not to build and no valid reason to build.
- I do not understand why anyone would think it was a good idea to place these houses here, other than they have a financial gain. Or they seriously had no brain cells.
- If watery lane closed the village is impossible to get out of the houses in the village are finding it hard to get home insurance due to being in a flood area.
- I do not believe that there are sufficient extra employment opportunities in the local economy.
- 98.5% of Hullbridge residents have already said no to this. Why it is still even being considered?
- Why not work at making a solution to this instead of making the bad situation far worse???
- Finally I object in principle to the policy which is not taking in to account the views of residents on the changing face of the village and the over development of the area.
- Insufficient attention was paid to surface water drainage issues when drawing up plans for this proposed development
- Too close to boundary
- Ferry Road has the water mains under the road. Heavy construction will cause the road to sink and damage the water pipes beneath. The village will lose its water supply.
- The sewers in Hullbridge cannot cope now with effluent often overflowing around the homes where I live when there is a lot of rain, on Hullbridge Road during very heavy rain the manhole covers lift and sewerage overflows, another 500 homes will make matters intolerable, the sewers cannot cope now how can they handle the increase.
- I condemn the idea of an offshore company (Gibraltar). These people sound very suspect, its criminals and tax evaders who favour offshore arrangements surely?
- The outline plan shows no indication of providing accommodation for elderly and disabled people. Roughly a third of the population are OAP's and realistically will pass on, leaving a thousand potential vacant properties, a fact that has been ignored.
- Also I understand that the current owners of the land have previously tendered an application to the council to build 3 dwellings on the land but were refused due to it being green belt !! so one questions why the council are

now happy to support this development which is of poor design and will be over-developed if allowed to go ahead.

- I can only reiterate WE DO NOT WANT THESE HOUSES or the associated problems that they will undoubtedly bring with them both from an infrastructure and social perspective.
- one last issue on ethics I own a plot of land in a plot of houses and have been told I will never get planning permission ,my neighbour owns a bigger plot all laid out amongst other plots and has always been refused.
- Please don't build 500 houses in Hullbridge especially by an offshore company evading British taxes
- During the summer we regularly have smells coming from the sewage works when the wind is in the right direction, those houses being built will get this full on. The smell was so bad one year that someone looking to buy a property in Hullbridge decided to move elsewhere.
- When heavy rain falls the sewage manholes fill with water and block and our house is not the only one it happens to, if 500 houses are built it will make matters worse.
- I have already had insurance denied because of the proposed development, So this says to me that there is a real threat to the surrounding area, and if others can recognise this who do not live in the area or are meant to have the local communities interests at heart, what does this say about our local authority?
- The development will be placed on an Equestrian yard. Where will the horses be relocated to? will another Equestrian site be built somewhere else locally? Other Equestrian yards in the area are already full. Under section 73 and 74 of the Government's National Planning policy framework on sporting and recreational facilities, even private ownership cannot be removed to make way for houses.
- There is no mention of the builders intentions to alleviate any of the objections, it is probably a case of build it be dammed and leave it when finished, leaving Rochford council to repair and maintain any problems, meaning Rochford will have to foot the bill and supply staff to deal with these, and I thought funds were stretched already.
- Any building in the proposed area with impact on the privacy of existing homeowners and in some cases affecting the light/sun into their properties.
- What are Rochford Councils proposals and timeline, for increasing/improving the existing infrastructure within the 'Village of Hullbridge' to accommodate the increased population?
- How is it proposed that this development will benefit existing Hullbridge Residents?
- What is Rochford Councils definition of: Affordable Housing? (Are we talking of 'Local Affordable Housing' as in Rented Accommodation, such as Local Authority Housing, Housing Associations and/or DHSS Housing?).
- Current understanding is that the number of dwellings in this location, have now been reduced to 250. Is this so?
- Now I can honestly say that I have lived in Hullbridge for 38 yrs and am considering selling up at the end of this year, because you are taking away the spirit of this small community.

- Would the sewage works which treat the grey water be able to cope with such a high volume of grey water.
- Homes built after January 2009 will not be covered by insurance (as applied under the old Flood insurance Statement of Principles) which is to avoid encouraging unwise building in flood risk areas.
- Just to the south west of the proposed development site is a sewage treatment works. Every year I have to call the environment agency concerning the foul smells emanating from the site.
- I have subsequently learnt that the dwellings in the proposed development will not have garages - why is this to be so.
- Access to Chelmsford for employment and university education. The Chelmsford bus services are limited and do not allow for an easy commute to access Chelmsford from Hullbridge.
- The Local Authority's archaeological advisor at Essex County Council will require archaeological mitigation measures in advance of development impacts occurring, some assurance is required.
- On the western side, approximately in the center of the site is an existing Telecommunications Mast which is indicated on the submitted master plan but is not mentioned anywhere in the supporting documentation. According to the Guide to Mobile Phone Masts and independent scientist and doctors these are a major health hazard. Cancer clusters have been found around mobile phone masts up to 400 meters from a mast which in this case would encompass the majority of the proposed dwellings.
- Visually the area will be significantly reduced in its natural beauty, reducing the attractiveness and appeal of the Hullbridge village. The land that is proposed as the building site is elevated at least 100ft above the surrounding roads, particularly those to the south and west. The visual impact for people approaching Hullbridge from the west will be significant. Instead of a natural green field being the main view on approach the village, 500 buildings will be visible at a greater elevation than the green field, due to the added heights of the buildings on top of the land. To the south and west, the development will be visible for approximately 3 miles, using a 'birds-eye' view.
- The close proximity of the SER6 development to the existing village will mean that there will be no effective way to avoid these effects. The length of disruption (to be measured in years) will open the possibility of psychological effects on local residents leading to a reduction of mental wellbeing and quality of life.
- Car parking facilities within the Estate for the public open spaces appear to be non-existent and it is not clear whether it would be any better in respect of new houses themselves (I suspect not) . With the proposed access points, I am concerned that Windermere Avenue will become a glorified car park with the resultant nuisance to the residents. Public car parking needs to be provided adjacent to the proposed public open spaces.
- Southern and Regional Developments are based in Gibraltar. In accordance with the Core Strategy site SER6a is to be delivered by 2021 and site SER6b by 2025. What proof does the planning office have that this company can deliver in the time frames stated. The developer has not provided any

guidelines dates on how they can achieve this. Until this has been provided this application should not be approved.

- The applicant on the Hullbridge application was Southern and Regional Developments. Their alleged address is 124 Irish Town Gibraltar. As reported to you in my 2nd unanswered letter dated 07/02/2015, there are six (6) other companies who show up on the web at this address; SRD does not seem to be one of them.
- The planning application, to build 500 houses on greenbelt land in Hullbridge was the first time Southern Regional Developments has ever been mentioned in relation to this development and the first time the residents of Hullbridge had ever heard of them, so who are they? Why do they need an offshore address in Gibraltar?
- Phase 2 Developments are named as the Agent on both the Hullbridge and the Rawreth application, so do they know who SRD are? Does RDC know who they are? It may not be illegal to do this but it does seem to me to be a blatant and deliberate attempt to deceive the residents, officers and councillors of RDC? In my opinion it also seems highly unethical.
- A company with the same name of Southern & Regional Developments was involved in a similar project in another part of the country (Eastleigh borough council). This was their logo as shown on the website.
- Note the identical logo of this Southern and Regional Developments to that of Landhold Capital. I assume they also had the same address in the UK.
- Is it a possibility, that all three are one and the same company? If so, this appears to me to be a blatant attempt to confuse everyone by applying as a company with an offshore address. This stinks, so much so, that I think they should all, including the agent who must have been aware of the company and address, be disqualified from these two developments and any future development projects in Rochford, either as applicants or agents. I am not legally qualified to comment on their accountability in law but remain extremely sceptical that they could or would make or honour any worthwhile commitment, financial or otherwise, to the project. Neither do they appear to display sufficient commercial integrity, in my opinion, to be in control of a project that will rape and ruin our greenbelt land for ever.
- With regard to your penultimate paragraph, I find this ridiculous in as much as it is tantamount to neglect of duty. It implies that if some unscrupulous developer applied to build on land crossing my boundary it is of no concern of your department or the authority. This is rubbish.
- Southern and Regional Developments Ltd Who are these people? Their address is stated as 124 Irish Town Gibraltar. There are 6(six) other companies also quoting this address:-
 - 1) FutureWorld, 124 Irish Town
 - 2) Addictive Tacks Ltd. 124 Irish Town
 - 3) Matrix Consultancy Services Ltd. 124 Irish Town

- 4) Endole (Open Company) 124 Irish Town
- 5) RRG[RRG Ltd 124 Irish Town
- 6) Contact – Production Music for TV 124 Irish Town
 - What is their relationship to Landhold Capital and to phase 2 developments?
Is this all smoke and mirrors?
 - Does it imply impropriety, e.g. lack of tax legitimacy or unaccountability for the project as an offshore company?
 - I noted with some suspicion, and raised the issue at the 2nd public presentation in the Hullbridge school , that you, had a meeting on a one to one basis with Phase 2 to discuss and agree changes to the wording of the-
ROCHFORD DISTRICT ALLOCATIONS SUBMISSION DOCUMENT
EXAMINATION (APRIL 2013) RE. POLICY SER6, submitted by PHASE 2/
LANDHOLD CAPITAL, which shifted many such infrastructure requirements from the front end to the backend of the planning process and project. This allows for an automatic escape of the responsibility of the developer onto the ratepayers of Rochford. This was done, agreed in its entirety and signed by you and Phase 2 without reference to any other interested parties.
 - We do not recognise the Company name of the applicant (Southern & Regional Developments Ltd) whose address is located in Gibraltar, we only recognise Landhold Capital, an explanation is required please.
 - How will services such as roads, sewers, drainage, gas and electricity be coordinated?
 - How will the site be sold? Will it be in one lump or small plots?
 - Will the roads etc. for the whole site, be constructed first? Who will be responsible for these?
 - Will the land be subject to a compulsory purchase order?
 - How will the site overall be controlled?
 - I formally request a copy of your list of the brown field sites that you have considered together with the relative supporting information and logic which led to their rejection. I make this request under the Freedom of Information Act. I wish to be able to compare your findings with those of the HRA.
 - Water pressure (Windermere Ave. has inadequate water pressure).
 - Construction traffic site access, should the project proceed, against the wishes of the whole village, must only enter and exit the site through the bottom of the site onto lower road and never through the village.

Hullbridge Residents Association

We refer to the Laws empowering the community to use the Freedom of Information Act, Localism Act (2011), The National Planning Policy Framework as prescribed by the Department of Communities and Local Government Act (March 2012) which includes a Distinctive Local and

Neighbourhood Plan (April 2012) and the Regulations Governing Neighbourhood Planning Laws.

We refer to the Outline Planning Application and submit our “Consultative Objections” which conforms to the NPPF policy 16. 66 namely – ‘that applicants are supposed to work closely with those directly affected by their proposals to evolve designs that take account of the views of the community’.

We invite Rochford District Council to reject ‘out of hand’ the Outline Planning Application in respect of a proposed development of 500 dwellings on site SER6a and SER6b in Hullbridge due to the Outline Planning Application (OPA) being totally in breach of all the National Planning Policy Framework clauses, LDF & Allocations Submission Document.

In our consideration, the Soundness and Legal Compliance of the relevant Legislation Guidance of the National Planning Policy Framework- NPPF 182 is not:

- Positively Prepared.
- Justified.
- Effective.
- Consistent with National Planning Policy Framework.

We (HRA) submit that approval of this application will be the first step to make life impossible to live with the obvious congestion that will be caused as indicated by the exhibits within this document, and we have provided ample evidence for an outright rejection of this Outline Planning Application.

Council letters to 640 residents in a community of 6548 residents, ignoring the remainder of the village and without courtesy to inform the HRA who represent the whole community of Hullbridge.

Government Portals in respect of identified Brown Field Land use in preference to Green Belt.

The Consultation Procedures laid down in the Core Strategy & Site Allocation Documents, The allocation DPD Document (Feb 2010)- Discussion & Consultative Document on page 1 (introduction) that the Council Statement of Community Involvement (SCI) is committed to Regulation 25 Public Participation in the preparation of Planning for the District.

The outline planning application has not adhered to the Rules and Regulations stated in Planning Law and the National Planning Policy Framework.

We therefore consider the rules for Consultation and the Statement of Community Involvement (SCI) take precedence over the CS because the OPA has fallen outside these rules and we, the community, are free to apply the rules as though they were new.

The Hullbridge Residents Association, have prepared this document with all the evidence required to allow the Rochford District Council, to reject the OPA. Serious anomalies affect the whole plan, we advise the RDC to consult with Hullbridge Residents Association, being the Representative and Stakeholder for Hullbridge.

The Hullbridge Residents Association set out our statements in our 'Consultative Objections' to this Outline Planning Application (OPA) as EXHIBITS on pages 9 onwards.

We refer to the LDF, Allocations DPD, Discussion and Consultative Document Regulation 25 (Feb 2010)- page 1- that the Council, as set out in its Statement of Community Involvement (SCI), is committed to public participation in the preparation of planning policy for the District. As such this document has been prepared for consultation in accordance with Regulations 25 of the Town & Country Planning (Local Development) (England) (Amendment) Regulations 2008.

RDC requested 'comments only' within 21 days (during the Christmas holidays) our letter dated 17 December stated that this was totally unacceptable and RDC allowed an extension of time to 30 January 2015, had this protest not been made we believe the RDC would have expected responses by 30 December 2014, to appease the developer.

This attitude has brought the RDC into disrepute to the whole Rochford community.

This document points out many RDC Rules & Regulations have been breached.

If our Queen makes a point to respond to her subjects' correspondence, we wonder if the RDC have been appointed as above the Queen and Government in their attitude not to respond and observe the procedures set out in all the documents that "Consultation" applies to both parties.

By the RDC ignoring the community it will result in some 12 years of our lives being disrupted by this proposed development.

Please remember the Hullbridge Residents Association represents 98.5% of the community and are able to 'consult' on their behalf. The committee of Professional people are very able to discuss the anomalies pointed out in this

document. And we are committed to seeking the best for the community in a non-political and conciliatory atmosphere.

We must protest that RDC has not applied the normal flexibility in the planning laws to allow sufficient time to have consultation on a Major Project of this size. We did request a further extension to end of February.

Please consider clause NPPF 188 Decision taking & Pre-application engagement allows the community early engagement between RDC and HRA and the opportunity to examine the effectiveness of the planning application.

Meaning of "Consultative Objections": The Hullbridge Residents Association wish to be consulted on all the issues raised in this document.

We have applied the clauses which allows the community to invoke the Localism Act 2011 chapter 20. Item 2.1 (5th bullet point)

This act stipulates that the Local community has: the 'right to challenge' (Part 5, Chapter 2, Clauses 81 to 86.)

Plans and Strategies – Part 6, Chapter 1, clauses 109 to 113, Neighbourhood Planning – Part 6, chapter 3, clauses 116 to 121, and gives them the right to Consultation – Part 6, chapter 4, clause 122.

This implies that the application should be:

- Positively prepared.

It is our observation that insufficient forward planning has been done towards the core strategy in view of the aforementioned exhibits.

- Justified.

In view of the aforesaid we do not believe there is any justification to provide 500 dwellings on this Green belt land particularly as the Core Strategy expressly stipulates that Green belt land should only be used as a last resort, many issues which we have demonstrated have not been addressed sufficiently.

According to the Localism Act 2011, we have demonstrated that transparency and consultation with the community were lacking.

- Effective

The conditions for the development of the Hullbridge site SER6 have not been satisfied therefore we ask for the complete withdrawal of this proposed development.

- Consistent with National Planning Policy Framework.

National policy insists that all the policies stated should be transparent and proper consultation pursued in relation to all the development criteria. We do not believe that proper feasibility studies and risk analysis have been

conducted in order to satisfy the requirements of the National Planning Policy Framework. Most subjects referred to in this presentation will imply reasons for withdrawal, in view of new Government legislation which was not available at the time of formulation, i.e. the Localism Act 2011 Chapter 20.

We refer to the LDF, Allocations DPD, Discussion and Consultative Document Regulation 25 (Feb 2010)- page 1- that the Council, as set out in its Statement of Community Involvement (SCI), is committed to public participation in the preparation of planning policy for the District. As such this document has been prepared for consultation in accordance with Regulations 25 of the Town & Country Planning (Local Development) (England) (Amendment) Regulations 2008.

The Chairman of the Hullbridge Parish Council stated that this was only an Outline Application, without realising that once approved there is no going back during the 3 year time period allowed before reapplication. Further opportunities will be available at the "Reserved matters" consultation period and the Full Application stage to raise objections, but only if proper 'Consultation' has taken place between the RDC and the community.

In majority of cases the LA advises the developer to make an appeal which may delay the development for up to 9 months and subject to the case officer recommendations.

However the whole projected time programme depends on the objections being countermanded.

With reference to the S & RDL Local Planning Policy Statements we consider that privacy will be a big issue with overlooking from the 3-story dwellings and overlooking by pedestrians to the rear of the properties. We think this will lead to neighbourhood issues and will not assist cohesion between the new and the existing residents.

Density scale and form: The dwellings now presented on the drawings and plans are totally unacceptable in that it contravenes the basic principles of the CS /LDF and NPPF that no more than 35% of the development should comprise 'affordable' dwellings of 3-storey height but is now calculated to be 92% of the development.

These 3-story dwellings will cause disharmony between the existing and newcomers, bearing in mind that in 2013 our survey suggested that only 41 dwellings would be required for the expansion of the families who require homes, we could imagine perhaps up to 75 dwellings required since the survey but where and how RDC evaluated 524 dwellings just beggars belief.

Village Design Statement: The word 'village' is a mockery in terms to Hullbridge, as no consideration is given to the fact that if this development is

approved the increased population will render Hullbridge to become a town, losing its village status.

With respect to the mention of a village plan, the Hullbridge Parish Plan does not exist and the Hullbridge Parish Council stated some time ago to the RDC that they are not equipped to draw up the necessary plans for a development of this size, quite understandably.

The HRA have applied to take responsibility for the Neighbourhood Planning Group, and as you are well aware, that we are equipped professionally to deal with this task for the foreseeable future, and hope that our request will be granted.

To justify and amplify our “Plea For Complete Rejection” we have referred to a recent court case as stated below:

The Case Law referred to is:

Case No: CI/2014/2773,2756 & 2874

Royal Courts of justice, Strand London.

Date: 24/10/2014

Before: Lord Justice Sullivan, Lord Justice Tomlinson & Lord Justice Lewison

Between: 1) Secretary of State 2) Reigate & Banstead Borough Council and 3) Tandridge District Council

Respondent: Redhill Aerodrome Ltd.

In considering the general impact on the population, traffic access and ingress, existing road network with flood impacting on Watery lane, the inadequacy of the existing infrastructure.

We have referred to a recent High Court case which cites the following NPPF clauses which closely resemble our arguments against the proposed development of Site SER6a and SER6b.

All the NPPF clauses referred to in this case is also mentioned in our submission herewith.

PPG2 Para 3.2- This is within the section of the PPG entitled “Control over development” and, within that part, sub-headed “Presumptions against inappropriate development” is generally dealing with what is required to make inappropriate development acceptable in the green belt. That means

considering the development as a whole to evaluate the harm that may flow from it being inappropriate, together with any other harm that the development may cause, to enable a clear identification of harm against which the benefits of the development can be weighed, so as to be able to conclude whether very special circumstances exist so as to warrant a grant of planning permission.

Our reasons for this development being inappropriate are numerous as indicated in the majority of the issues in this submission and can name a few- Infrastructure, housing congestion, traffic congestion in a self-contained area with insufficient access and ingress to satisfy the increased population and vehicles. A disproportional increase in the affordable homes now increased to 92% of the original capacity mentioned in the CS and the LDF of 35%. No statements are made to eradicate our annual flood problems. No plans to improve Watery Lane which will only exacerbate this long running issue.

NPPF Cl. 17. 12 Core Planning Principles

NPPF 4.32 – Transport – Developments generating significant amounts of movement should be supported by a transport statement/ Assessment taking into account sustainable opportunities for modes of transport and corresponding infrastructure. Safe and suitable access to the site. Improve the existing transport network that cost effectively limit the significant impacts of the development.

Our statements in Section 8 particularly where we have calculated the unwarranted explosion in our population by approximately 92%, with the reciprocating increase in traffic over a 12 year period calculated to be 92% x say 6200 existing vehicles will undoubtedly have an impact on the congestion on roads, already congested and will also affect the surrounding areas such as Rayleigh and Rawreth.

RDC and the developers have not taken into account that we are a self-contained village bounded by a river to the north and only one way of ingress and access (Ferry Road and Lower road).

NPPF 9.80 – Green belt serves 5 purposes: 1) To check the unrestricted sprawl of large built up areas. 2) To prevent neighbouring towns merging with one another. 3) To assist in safeguarding the countryside from encroachment. 4) To preserve the setting and special character of historic towns. 5) To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

We hope the RDC and the developer will acknowledge that this clause, with its 5 purposes, provides us with ample opportunity to have confidence that the whole plan should be rejected.

While there may have been some changes in the Green belt Policy in the framework, protecting the Green Belt remains one of the Core planning principles and the fundamental aim of Green Belt Policy to prevent urban sprawl by keeping land open, the essential characteristics of Green Belts, and the five purposes that they serve, all remains unchanged. By contrast with NPPF 9.86 of the Framework, which does change the policy approach to the inclusion of villages, within the Green Belt, and policy NPPF 9. 87 emphasises the continuation of the Green Belt policy in respect of inappropriate development.

NPPF 9.87- Inappropriate development is by definition harmful to the Green Belt policy, and should not be approved except in very special circumstances. The harm to the green belt by reason of openness and the encroachment into the countryside has substantial weight.

This clause further emphasises the importance of NPPF 9.80, 9.87 and 9.88

NPPF 9.88 – When considering any planning application consideration, the LA should ensure that substantial weight is given to any harm to the Green Belt. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm is clearly outweighed by other considerations. This is classified as a central Government policy.

This clause further emphasises the importance of NPPF 9.80, 9.87 and 9.88

The impact assessment in respect of the Framework published by the DCLG that the Government strongly supports the Green Belt and does not intend to change the central policy that inappropriate development in the Green Belt should not be allowed under the sub-heading “Policy Changes” the Impact Assessment said that “Core Green Belt protection will remain in place”, minor technical issues have been resolved in changes to the detail current policy but does not harm the key purpose of the Green Belt and the openness and purposes of including land in the Green Belt will be maintained with NPPF 87 and 88 of the Framework which appears to constitute the central Policy which the Government did not intend to change.

As mentioned in previous statements the Government Portals have firmly set their policy of Green Belt being used as “a last resort”. Particularly while there are 11 ‘Brownfield’ sites which will adequately fulfil the demand for homes to satisfy the indigenous population.

Therefore, applicants must consider all negative impacts of the proposed development and the effect that they may have on decisions in the context of the Green Belt, by virtue of being ‘any other harm’. By way of example this might include minor increases in traffic movement, impacts to a heritage asset or increases in noise pollution.

In weighing up whether very special circumstances exist, an authority can consider these cumulative effects of individual impacts. This is regardless of whether or not they are considered harmful to the Green Belt as individual considerations.

The NPPF does not affect a fundamental shift in policy governing the Green Belt, at least not to make development easier.

The presumption against inappropriate development in the Green Belt remains unaltered and is not diluted by the NPPF’s attempt to simplify and clarify planning policy through a single document.

The following NPPF clauses are mentioned in this Court Case and are also mentioned in appropriate ‘Exhibits’ in this document:

NPPF 12.133- to Safeguard against the heritage asset being destroyed.

NPPF 11- Conserving and enhancing the natural environment.

NPPF 12 - Conserving and enhancing the historic environment.

NPPF 6.47- Delivering a wide choice of high quality homes.

EXHIBIT 1

NPPF 1. Introduction.

1.1 This provides a framework within which local people can produce their own distinctive local and neighbourhood plans which reflect the needs and priorities of their communities. We request RDC honour this clause in its entirety.

NPPF 7.56 and 11.109 & 111 – Requiring good design.

1.2 Land shown 'white' (North West corner) on the Master Plan is excluded from the previous development area for building purposes (23.4 hectares), we believe the owner will not allow this land to be developed. We have calculated that this area (0.757 hectares) would provide 19 dwellings using the figures provided by the applicant. This omission along with other areas reduces the site area to 21.79 Hectares. We are surprised that this omission was not indicated in the Local Development Framework document when the RDC had sufficient time to make this known.

The HRA place on record that items 1.1 to 1.2 are our 'Consultative Objections' - Exhibit No. 1

EXHIBIT 2

NPPF 14 Plan making & NPPF 17 & NPPF 9. 79-92 – Protecting the Green Belt.

1.3 Site Allocation Policy SER6a & 6b is not defined in the OPA Master Plan (section 8) and these two areas are distinctly indicated in the Core Strategy and the LDF but have been omitted without any explanation.

The areas stated are SER6a = 13.6 hectares and SER6b = 9.8 hectares.

We refer to the Allocation Submission Document Clause 3.159 which states that area SER6b (9.8 hectares) should be 'safeguarded from development' till 2021 unless required to maintain a 5 year supply of land. We submit that the omission of the area SER6a & 6b on the Master Plan is in contravention of this clause

1.4 One area marked 'white' presumed to be the bungalow to remain on site but not described in the OPA documents. The area bounded by the property has been accounted for in our Table 1.

We are concerned that this was not known at the time of producing the Core Strategy documents, will you clarify?

1.5 In the Design and Access statement 'Key Site Features' the map shows the extent of the planning application, but wrongly does not remove the existing farmhouse and surrounding area which are to remain as per Master Plan. This reduces the hectares of the site which in turn impacts on the density.

NPPF 4/5. 42-43 Existing buildings on site

1.6 Remove areas of 2 buildings which remain on site.

We, the HRA place on record that items 1.3 to 1.6 are our 'Consultative Objections' - Exhibit No. 2

EXHIBIT 3

NPPF 9.79 to 82 apply – Protecting Green belt land.

1.7 Particularly clause 80 'Green belt serves 5 purposes.

- 1) To check the unrestricted sprawl of large built up areas.
- 2) To prevent neighbouring towns merging into one another (Rawreth and Hullbridge mentioned elsewhere)
- 3) To assist in safeguarding the countryside from encroachment.
- 4) To preserve the setting and special character of historic towns.
- 5) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

NPPF – Plan Making NPPF 14 & 17 & NPPF 9

1.8 Create a Green Buffer Zone 0.4 Ha. SER6a Page 158 CI 3.168

A buffer zone dividing the old and new part of the Village, will not foster greater Community **Cohesion** in this Community. This will be a divisive form of demarcation in this village.

1.9 No buffer zone shown affecting the back gardens of Harrison Gardens, Ambleside Gardens, Elm Grove and Malyons lane (some 41 existing properties). The rear of the properties in The Priors and Abbey Road do have the buffer zone shown. We are not satisfied that proper assessments were made.

We, the HRA place on record that items 1.7 to 1.9 are our 'Consultative Objections' - Exhibit No. 3

EXHIBIT 4 Boundary Line

NPPF 14, 17, 9.79-85, 178 & 179- Plan making 150-157. Boundary line separating Hullbridge and Rawreth.

1.10 The long established existing boundary line between Hullbridge and Rawreth has been ignored. It is for the Boundary Commission to decide about boundary line. Land divided by a boundary line between Rawreth is clearly indicated on the Ordnance Survey Plans. Our calculations suggest that the areas are 30.5% and 69.5% respectively of a total area of 23.4 Hectares. No explanation given for the encroachment of the boundary line separating Hullbridge from Rawreth. We

understand that the two parish Councils have been in discussions about the boundary line but the community are not privileged to the information from either Parish Council.

1.11 Mr. Marsden-Carleton, the HRA Chairman, had a meeting with Mr. S. Scrutton in September 2013, witnessed by Mr. Barry Mears, when questioned about the breach of the boundary line stated that he did not recognise this boundary line. Our objection is that the RDC have ignored the clauses in the Core Strategy and the Local Development Framework Documents, that boundaries under the auspices of the boundary commission should not be disturbed without the authority of the Commission. Furthermore, how were the residents involved in the consultation document in respect of green belt erosion (page 34 – Option SWH1). How is the green belt protected, if being built upon?

Option SWH2 page 36 mentions that the site currently suffers from congestion, but this is not mentioned in SWH1- as being a strong defensible greenbelt boundary.

The boundary line has clearly been breached but there is no explanation as to why the RDC are able to ignore this boundary line which puts a large proportion of the land within Rawreth (30.50%). According to the Boundary Commission legislation there should be at least a ten metre distance on each side of the boundary line.

Moreover, in several letters written to all concerned by HRA, the Government had consistently advised the Local Authorities, via their Planning Portals, that the use of green belt land should be a last resort, are completely ignored.

We are not provided with the opportunity to discuss the removal of the boundary line and by what authority is the RDC allowed to do this. Rawreth and Hullbridge Parish Council may have held discussions on this subject but we are not given this information. We therefore have the right to ask for all necessary information under The Laws Empowering the Community to use the Freedom of Information Act appertaining to this issue, and request all necessary information justifying the breach of this boundary line.

NPPF 12.128-141

1.12 OPA Section 6 item 6.3.3 page 22. Review of potential development upon Heritage Assets. ECC Archaeological advisor at Essex County Council will require mitigation measures in advance of any development impacts occurring. No assurance has been given. Also it is noted that the historic field boundaries within the site comprise undesignated heritage assets of local significance and it is recommended that the orientation and preservation of these historic boundaries should be encouraged within the detail of the development proposals, this does not

appear to have been incorporated within this scheme especially the Ward Boundary between Rawreth and Hullbridge. There are issues of Duty of care and the question of what mitigation factors have been taken into account?

NPPF 9. 84 & 85

1.13 Figure 12 2013 Ordnance Survey indicates different coloured areas but not distinguishing the boundary line as the previous plans, The references to LDF/ASD clauses 3.12 and 3.187 above applies and the NPPF clauses listed below.

NPPF11 & 12 & 178

1.14 Item 6.3.4 Highlighted – ‘that the orientation and preservation of **historic boundaries** should be encouraged within the detail of the development proposals. Expansion of the mitigating circumstances required.

1.15 Figure 6. 1873 Ordnance Survey indicates a boundary between Hullbridge and Rawreth but not identified. Refer to LDF/Allocation Submission document- Clause 3.12 states that the Green belt Boundary must be defended. Refer to page **61 clause 3.187** which describes the terms of design and visual impact of the site. A harsh demarcation of the Green belt Boundary to the west of the site should be avoided and appropriate landscaping should be implemented along the western boundary.

The above statements include the following:

1.16 Figure 7 1921 Ordnance Survey.

1.17 Figure 8 1937 Ordnance Survey

1.18 Figure 9 1956 Ordnance Survey

1.19 Figure 10 1961- 1974 Ordnance Survey

We, the HRA place on record items 1.10 to 1.19 are our ‘Consultative Objections’ - Exhibit No. 4

EXHIBIT 5

NPPF 4.32 Access Points and Parking

1.20 There are six green arrows highlighted on the plan, indicating access points, very similar to the access points made in Mr. B. Marsden-Carleton's submission in July 2013 on a 'street map' forecast in the submission, as possible vehicular movement points.

Caveat. Applicants will be expected to work closely with those directly affected by their proposals to evolve designs that take account of the views of the community.

1.21 It is noted that although not shown, the **access** from Windermere Avenue, Harrison Gardens and The Priors will be used for vehicular traffic, probably as a temporary access road to start off with then become permanent exactly as predicted in the street plan submitted in September 2013.

What guarantees are given that this will not be the case? We are unable to find any assessment on this issue.

1.22 OPA Chapter 5 page 67 – Access & Movement. Feeder (spine) road and Minor access road described on plan.

1.23 LC assured us there would be no additional vehicular **access** onto the site, but the detail drawings show extensions of existing roads onto the site from Windermere Avenue, Harrison Gardens and The Priors. We have also found that the proposed Malyons Lane access does not comply with the Essex Design Guide Type 3 Feeder Access Road being required to be 5.5m wide (not 4.5m as shown) together with the required suitable speed restraint measures and 2.0m wide footpaths each side of the carriageway.

NPPF 4 & 5 New Roundabouts and Access

1.24 The position and type of site access is too near the bend at the junction with Watery Lane especially with a proposed new mini roundabout at this junction with Lower Road which is approximately 95m from the proposed new large main roundabout which is only 250m from the existing mini roundabout at the junction with Ferry Road. We were informed by LC that Lower Road would have priority, but this will not be the case now especially with the probability of 1000 vehicles trying to egress onto Lower Road from the new site. It is also obvious that with 3 roundabouts, 4 pedestrian crossings and a bus stop this will cause greater congestion that we have now on these roads.

The traffic study used is 5 years old and out of date, stating that an average of 11 vehicles queue on Lower Road to access into Watery Lane and a similar number

queuing at the existing mini roundabout on Lower Road/Ferry from the east, our survey shows that there are regularly 30 cars queuing during rush hours and school runs making residents late for work and school. We fail to see the logic of 2 new roundabouts together with 4 pedestrian crossings on Lower/Hullbridge Road.

1.25 There is no doubt these new roundabouts etc, will cause congestion generally by increased traffic, adding to the present congestion. Remember we will have to put up with this upheaval for about 12 years. Please supply the assessment made to justify this extraordinary plan.

NPPF 6

1.26 Master plan shows – additional roads and hammerheads that disagree with master plan, A4 plans hidden at the end of the documents. Refer to my 'roads plan' submitted to the hearing in Sept. 2013.

My prophesy of builders using the access points located at 5 points on the road plan looks like being used after all in spite of LC denial – check A4 plans.

1.27 These other access points will become apparent if development begins, and are very conveniently identified by gates erected at (as identified in our Road/street map, included within the submission in September 2013.

2) Gate at The Priors (facing north at the north end of this street).

4) Gate at the south end Harrison Gardens.

5) Gate at the south side of Windermere Ave.

6) Gate at the south end of West Ave.

7) Gate at the west end of Grasmere Ave.

8) Gate at the west end of River view Gardens.

Gates 2&4 are in development area SER 6a and gates 7-8 are outside the development area.

NPPF 4.29-41 Vehicular movement

1.28 With new areas vehicular movement should be convenient, safe and pleasant. Through traffic must be excluded from new residential areas and layout & attractiveness of the environment should be such as to discourage the use of cars for local trips, encourage walking & cycling. All new roads in residential areas containing a road over 100m length to be served by roads designed for a speed of 20mph.

We, the HRA place on record that items 1.20 to 1.28 are our 'Consultative Objections' - Exhibit No. 5

EXHIBIT 6

1.29 Car parking – car parking should be provide for both residents & visitors at an adequate level & in such locations as to be reasonably convenient, visually inconspicuous & limit opportunities for car crimes.

1.30 Page 66 Secondary Access – Green arrows Indicates access points from the following roads – 1) Windermere Ave. 2) Harrison Gardens, 3) Malyons Lane, 4) Main spine road leading from Lower Road to Malyons Lane, 5) The Pories and 6) Lower Road, and 7) an arrow leading into rawreth area.

NPPF Miscellaneous. Guarantees

1.31 No guarantees have been provided by the developer that these access points will not be used for site vehicular traffic and eventual access to the proposed new road layout.

We, the HRA place on record that items 1.29 to 1.31 are our 'Consultative Objections' - Exhibit No. 6

EXHIBIT 7

NPPF 8.69-70 NPPF 9.86 NPPF 11.109 – Conserving & Enhancing Natural Environment.

1.32 By the character change to the aesthetics of the proposed 3-storey buildings will separate the old from the new Hullbridge with integration being difficult to ascertain in the fullness of time.

Due diligence has been abandoned by no consideration given to congestion of the properties, and this will be evident from any sight from Lower Road, Malyons Lane, Elm Grove, Ambleside Gardens and Harrison Gardens and Windermere Avenue but the statement made by S & RDL state that the new proposed properties will not be seen from lower road. The visibility can be proven by taking photographs at the height of the 3-storey buildings, ie top of barn, telecommunications mast or scaffolding

We, the HRA place on record that item 1.32 is our 'Consultative Objection' - Exhibit No. 7

Exhibit 8

NPPF 8.73 Open Space

2.1 The large public open space in the Rawreth area in the extreme north east of the site are likely to be 'football pitches' (as indicated by Mr. R. Taylor of Landhold Capital at the exhibition) providing youth facilities. The majority of the planned open spaces will only benefit the new development. We are unable to find the assessment made on this issue.

Where will the car parking, changing rooms, toilets & youth facilities be located?

This will not only reduce the amount of Green Infrastructure but add to impermeable areas.

NPPF 12 & 17 150-157 Open Space and Youth facilities

2.2 Pages 58. and 59. Clauses 3.167, 3.169 and 3.173 prescribe a total of 3.72 Ha for Green space and Youth facilities in area SER6a. After deductions, we are left with 17.36 ha divided by 500 homes = 0.0346 ha per dwelling or 347 square metres approximately including external space.

2.3 To the right of the proposed junction of the Site Access and Lower Road is a proposed Local Play Area right next to the highly congested Lower Road, possibly highly accident prone. An assessment on this issue is not found.

We, the HRA place on record that items 2.1 to 2.3 are our 'Consultative Objections' - Exhibit No. 8

EXHIBIT 9

NPPF 7.57-59. 9.82

2.4 Two properties- one bordered in red (0.12 hectares), although not defined, we assume will remain in position on site. The other building shown in white is similarly placed (0.012 hectares), although not defined, we assume will remain on site. It is worth noting that both these buildings will remain on site and will be surrounded by 3-storey buildings.

NPPF 6.47 Delivering a wide choice of high quality homes.

2.5 The OPA is not presenting any choice with the majority of the dwellings being proposed to be 3-storey high as indicated on plan No. 361

NPPF 7.56-58 Requiring good design.

2.6 We believe this design is in contravention of these clauses as they will be in uniform style, with inadequate opportunity to provide the wide choice anticipated.

We, the HRA place on record that items 2.4 to 2.6 are our 'Consultative Objections' - Exhibit No. 9

EXHIBIT 10

NPPF 9.86 Preserving the character of the village.

2.7 The OPA shows no sign of preserving the character of the village. This is an important clause proving the OPA have not considered the implications of the non-cohesive aspects of this development with 3-storey buildings becoming the dominant view and feature, of the whole site under the pretext of developing the need for 'affordable housing'

NPPF 9. 86 –to The need preserve the character of the village.

5.12 This is an important clause proving the OPA has not considered the implications of the non-cohesion aspects of this proposed development with 3-storey buildings becoming the dominant view and feature of the whole site under the pretext of developing the need for 'affordable housing'.

We (The Hullbridge Residents Association) reject the complete OPA as it does not conform to the NPPF clauses stated above and has abandoned the requirements of the CS and the LDF.

5.13 This development, if given approval, will be out of keeping with the existing character of the village.

NPPF 9. 87- 89 Inappropriate development should not be allowed.

2.8 The items stated above indicate that this is an inappropriate development and is not in accordance with the

NPPF clauses.

2.9 We (The Hullbridge Residents Association) completely reject the OPA as it does not conform to the NPPF clauses stated above, and has abandoned the requirements of the CS and the LDF.

NPPF 10. 97 Carbon Emissions.

2.10 Suggests community-led initiatives form renewable and low carbon energy including the development outside such areas being taken forward through Neighbourhood Planning (the Hullbridge Residents Association have requested to take on this responsibility as the Parish Council have stated that they are not able).

NPPF 10. 93- 94. Meeting the challenge of climate change, flooding and coastal change.

2.11 Suggests that, to support a low carbon future, the LA should deal sensibly with items stated and we are not sure how the developer is going to meet the Government target for moving to zero carbon housing from 2016 onwards by reducing the carbon emissions (i.e. no burning of fossil fuels), especially as they have already obtained quotations for new Gas and Electricity mains supplies for the development. Local authorities are supposed to have responsibility in leading their communities in dealing with climate change therefore the subject of housing supply should have been looked at alongside the reduction of carbon emissions.

We, the HRA place on record that items 2.7 to 2.11 are our 'Consultative Objections' - Exhibit No. 10

Note: We inform the RDC that the only conversation we had was with Landhold Capital. With the new developer

(S & RDL) being received by the RDC in the way of the OPA, we submit that **fresh consultation is required**.

EXHIBIT 11

NPPF188-195. NPPF 198-202 Decision taking – Pre-application engagement and front loading. NPPF 203-207 Planning Conditions and obligations.

3.1. There was no early engagement with RDC thus not allowing us an opportunity to examine the effectiveness of the planning application. The Developer has not

adequately assessed the pre-planning or development aspects which make it detrimental to the enhancement of the village.

3.2 The application form was completed by an unknown developer (applicant) namely Southern & Regional Developments Ltd of Gibraltar. We are only aware of Landhold Capital Ltd of London.

3.3 The question we ask is why the community were not informed of S & RDL interest in this development like all the other prospective developers.

3.4 By invoking the Freedom of Information Act, we, the community, have the right to have sight of the prequalification details provided by S&RDL prior to being invited to 'compete' for the development opportunities and what criteria allowed them to take precedence over the competing companies.

3.5 Section 1 and 2 – What is the relationship between the following Companies who have an interest in the proposed development of this site, namely:

- Broadway Malyan – Architecture Urbanism Design of 3 Weybridge Business park, Addlestone Road, Weybridge Surrey KT15 2BW
- Landhold Capital of 28-32 Wellington Road, St. Johns Wood, London NW8 9SP.
- Phase 2 Planning & Developments Ltd, Majesty House, 200 Avenue West, Great Notley, Braintree Essex. CM77 7AA
- Southern & Regional Developments Ltd of 124 Irish Town, Gibraltar.

3.6 The Website, www.LandholdCapital/businessopportunitieswatch/currentprojects/identify. The Company is noted as acquiring & promoting strategic land.

3.7 A questionnaire sent by HRA to Landhold Capital (Mr. Robert Taylor & a copy to Mr. Dodkins) remains unanswered with a verbal reply from Mr. Taylor that all questions remain in the domain of RDC, but Phase 2 Planning are named as the Agent for Southern & Regional Developments. We are not sure if this is a typical ploy to pass the buck.

3.8 We made an investigation on the Landhold Capital Website and uncovered many issues that Mr. R. Taylor refused to answer by the two Questionnaires 11/6/14

and 1/7/14, letters dated 29/8/14, 2/9/14, 12/9/14, and 30/9/14. A conversation with Robert Taylor of Landhold Capital revealed he denied any knowledge of the website (www. Landhold Capital and the contents).

3.9 What guarantees are being offered in case of default or bankruptcy or any undertakings agreed to by the developer?

We, the HRA place on record that items 3.1 to 3.9 are our 'Consultative Objections' - Exhibit No. 11

EXHIBIT 12

NPPF 173 Planning obligations – Draft Head(s) of Terms

3.10 A) - Validation Planning Applications – Planning Validation (Local list & explanatory notes).

Planning obligations (section 106 agreements) are intended to make acceptable development which would otherwise be unacceptable in planning terms.

Proposed Heads of terms should be submitted with the application. Model templates should be supplied by the developer.

Please provide these details under the terms of 'Freedom of Information Laws.

B) Application for outline Planning Application with some matters reserved:

National requirements – all the plans submitted should have the North direction but this is not shown on the drawings- Drawings 101, 201,321, 351 and 361.

The Bar scale should be 1:100 or 1:200 but is 1:1250 @A1.

NPPF 173 (cont Planning obligations – Draft Head(s) of Terms (cont

3.10 (cont No Ownership Certificates are included in the Application. As required by Article 7 of the Town and Country Planning (General development Procedure) Order 1995, Agricultural Holding Certificate and Ownership Certificates B,C or D in accordance with Article 6 of the TCP Order 1995.

We, the HRA, place on record that item 3.29 is our 'Consultative Objections' - Exhibit No 12

EXHIBIT 13

The Application Form has been completed as follows:

3.10 Description of the proposal: Why is “Layout and Scale” classified as ‘reserved matters’ ?

3.11 Section 4 – If part of site identified to be in Rawreth area, what will the address be known as ?

3.12 Section 5 – NPPF 188-195 Pre-Application Advice and Pre-qualification not provided.

No details of the advice given by the case officer at pre-application stage.

Is RDC negligent in its duties to the community as a response from Mr. S. Scrutton, Head of the Planning and Transport Department in Rochford District Council, stated that RDC did not have a duty to make prequalification enquiries?

3.13 Section 6 - 5th question = ‘rights of way’ – answer given is ‘no’, incorrect, there is a right of way through the site from Malyons Lane. There is a ‘Public right of way’ sign at the entrance of Malyons Lane, off Ferry Road, but this is not marked on the plans.

3.14 Section 11 – Foul Sewage - What assessments have been made in respect of the existing foul water drainage which falls short of existing standards?

The sewer plan as shown on the combined services layout drawing by Cannon has been checked. It does not appear to need diverting but we state the following: the invert of the existing foul sewer should be established to give the required protection of approximately 900-1200mm below the proposed new access road.

3.15 Section 12 – Flood assessment – 4th Q – ‘will proposal increase flood risk elsewhere – answer should be ‘yes’ (not ‘no’) Possible additional minimum 275,000 gallons of water from impermeable surfaces. Where is the existing watercourse and will it be capable of additional water distribution?

We require an assessment report to clarify this statement.

3.16. Section 13 – Biodiversity & Geological Conservation – 3 answers given as ‘No’ – have surveys been carried out? bats, slow worms, badgers and foxes?

3.17 Section 14 – Existing use – Has survey been carried out to ascertain made up ground and infill ponds? Electric substation on site.

3.18 Section 17 – Residential units – Market housing proposed -where are the low, medium and high density dwelling calculations? Social Housing given as 140 units (unknown) ? Intermediate housing – proposed given as 35 (unknown) The plans state 3-storey buildings will be Medium and High density development, in contravention of the CS – Policy H2 and H3. Total proposed units mentioned as 500, we have calculated this now to be 524 units (including the area in the NW corner now excluded from this application).

3.19 Section 18 – ‘All types of development’ include additional shops etc mentioned in CS, but this is not mentioned in this section. What assessments have been made in respect of forecasting any trade effluent from restaurants etc ?

3.20 Section 21 – Site area. Original CS and LDF = 23.4 hectares but now stated as 21.79 ha.

Why can we not find any statement to ratify the reasons for this reduction?

3.21 Section 24 – Site visit – can site be seen from public road etc. stated as “no” should be “yes”.

The answer indicates lack of concentration on the questions given and seems that a couldn’t care less attitude exists when making the plans and completing the form.

3.22 Section 25 – certificates ‘B’ No list given.

This section is signed by the agent with out the name of the owner stated.

3.23 Broadway Malyan, Architectural Urbanism Design. HRA (Mr. B. Marsden-Carleton) was informed by Mr R. Taylor, Landhold Capital Ltd Planning Director, that they are the advising Agents to Mr. Beckwith.

Under the freedom of information Act we require details of the relationship between Broadway Malyan and the other Companies as indicated in our item 3.2 above.

3.24 The HRA insist there are too many errors in the Application Form and elsewhere and request answers to these important questions. Had RDC done a basic prequalification and validation check at time of enquiry made by Landhold Capital, the answer would have been stated on the form, this is a basic error on the part of Phase 2 Planning who are the Agents for the Applicant.

How come you will discuss all this with the developer but not with the community who will have to live with this proposed development for the rest of their lives.

3.25 In view of the above anomalies in completing the Application Form, we consider that Southern & Regional Developments Ltd should be required to assist RDC in their enquiries as to the adequacy to be the developer of this proposed site.

3.26 Can RDC advise HRA when they knew that S & RDL would be the designated 'development applicant'.

3.27 The Developer - Southern and Regional Developments Ltd - have ignored the guidelines submitted by the RDC in the documents stated above.

3.28 That the Developer has not provided the RDC with proper evidence of status to provide construction services, we demand that the business & financial status and operation from an off-shore base is thoroughly investigated, and to verify that proper safeguards are provided throughout the period of this proposed development and to provide adequate guarantees to safeguard its development operation on this important green belt site.

3.29 We are surprised that Mr. S. Scrutton has stated to our Chairman in writing on the 2/1/15 that the RDC have no responsibility to request and check all prequalification details that should have been submitted at the time of enquiry and to allow this off-shore developer to operate without the proper checks having been carried out.

3.30 Our Chairman asked the RDC why the name of the developer, Southern & Regional Developments Ltd had not been provided at the beginning of the enquiry stage in 2012.

The only Companies we are aware of are Landhold Capital of London who were the Company who held the exhibition at the Hullbridge School last June 2014. Broadway

Malyan Architectural Urban Design of Weybridge, Surrey KT15 2BW, Phase 2
Planning Ltd of Braintree Essex.

3.31 The RDC must know that unrestricted planning applications bring the RDC into disrepute. Planning Law insists that all credentials must be submitted and properly scrutinised and not leave this duty to residents who happen to be in the industry and understand the Rules and regulations in this respect. HRA can argue that we have done a job which is the responsibility of the LA.

3.32 We provided the RDC Planning Department with details of the website which can be checked to ascertain the operations of Landhold Capital Ltd, via the internet (www.landholdcapital.com) also at www.sjl.co.za and another site at www.sjcapitalgroup.com and is promoted as “an independent strategic land and planning promotion company”, which also explains the operations of the following Companies – UK Land Investment Group (review of) and of special interest is the report produced by Auditors Moore Stephens sounding a large warning bell when a number of Directors resigned and filed notice under section 392 of the Companies Act, and the way they buy and sell land to people through SJ Capital Group (a company designed by a South African Company). St. James’s Land Ltd & part of the statements made referring to planning laws being broken. UK Property Fund Managers Ltd (UKPFM). A partnership between UKPFM and NHS Trust.

3.33 According to the website it is explained that Landhold Capital has bought and is selling at: Hedge End- Hampshire, Hullbridge- Essex, and 3 other sites.

When Mr. Marsden-Carleton sent a ‘Questionnaire’ to Robert Taylor, the Planning Director, requesting this information amongst other questions, of which Mr. Scrutton/ Hollingsworth have a copy, this was completely denied.

3.34 We believe it is not too late to make this investigation of LHC & S & RDL to absolve yourselves of any blame, should that unfortunate occasion arise.

3.35 We must protest at the method adopted by RDC to invite such companies to take an interest in Green belt land before performing the normal prequalification enquiries which all Local Authorities are obliged to undertake.

3.36 With the above information being of immense importance in our view, we make no apologies for requesting that the RDC reject this application out of hand and

conduct a thorough investigation into these companies' activities and the relationship between the Companies given above and the companies who are now identified within this application.

3.37 We therefore have the right to ask for all necessary information under The Laws Empowering the Community to use the Freedom of Information Act appertaining to this issue and request all necessary information should this site be brought into the proposed development phase.

We, the HRA place on record that items 3.27 to 3.37 are our 'Consultative Objections' - Exhibit No. 13

EXHIBIT 14

NPPF 153-157 Plan making. NPPF 158-159 Using a proportionate evidence base.

3-38 This clause requires the RDC to provide up to date, annual surveys and annual evidence and updates on relevant economic, social and environmental characteristics & prospects of the area. The Local Authority should ensure that their assessment of, and strategies for housing, employment and other uses are integrated and that they take full account of relevant market and economic signals. The last time the assessments were made was in 2013, two years out of date. The policies identified here by default become the policies for the applicant to comply with.

An example given by a recent Estate Agent providing an evaluation of existing market price indicating a reduction in price of £15,000, which is likely to reduce further if building work commences.

3.39 Our examination of the RDC website does not provide the full information as required by the above NPPF clause to satisfy the criteria as set out above. The latest information is dated April 2013 in the LDF document (Development management Submission Document).

We, the HRA place on record that items 3.38 to 3.39 are our 'Consultative Objections' - Exhibit No. 14

EXHIBIT 15

NPPF 8.73 Open Space Ecology 11.117

5.1 Development Layout Plan.

The development should be laid out in such a way as to safeguard the existing ecology, improve the natural habitat & minimise heat loss from buildings and limit overlooking.

Open space- if the number of family dwellings with less than 100sqm gardens, play spaces to be provided on the basis of 3sqm per child space resulting in 3-4% of site area.

NPPF 7.66, 8.69, 9.82, 9.86, 11.123 & 171

5.2 At the Exhibition Landhold Capital stated that all views of the existing dwellings will be respected. The proposed plans will not allow this to happen when a good proportion of new buildings (medium & high density) are to be 3-storey buildings. We also have the potential hazard of possible vandalism and security issues affecting the back gardens of Harrison Gardens, Ambleside Gardens, Elm Grove, Malyons Lane, Abbey Road and Abbey Close. We are not satisfied that proper assessments were made.

We, the HRA place on record that items 5.1 to 5.2 are our 'Consultative Objections' - Exhibit No. 15

EXHIBIT 16

NPPF 9. Cl. 84 & 85 Boundary Line

5.3 Figure 12 2013 Ordnance Survey indicates different coloured areas but not distinguishing the boundary line as the previous plans, The references to **LDF/ASD clauses 3.12 and 3.187** above applies and the NPPF clauses listed below.

NPPF11 & 12 & 178

5.4 Item 6.3.4 Highlighted – 'that the orientation and preservation of historic boundaries should be encouraged within the detail of the development proposals. Expansion of the mitigating circumstances required.

5.5 Figure 6. 1873 Ordnance Survey indicates a boundary between Hullbridge and Rawreth but not identified.

LDF/Allocation Submission document- Clause 3.12 states that the Green belt Boundary must be defended. Refer to page 61 clause 3.187 which describes the terms of design and visual impact of the site. A harsh demarcation of the Green belt

Boundary to the west of the site should be avoided and appropriate landscaping should be implemented along the western boundary.

The above statements include the following: Figure 7 1921 Ordnance Survey, Figure 8 1937 Ordnance Survey, Figure 9 1956 Ordnance Survey and Figure 10 1961- 1974 Ordnance Survey

We, the HRA place on record items 5.3 to 5.5 are our 'Consultative Objections' - Exhibit No. 16

EXHIBIT 17

NPPF 9, Cl. 87 to 89 – States that inappropriate development should not be allowed.

5.6 The HRA reserve the right to request why the LDF/ASD clause 3.12 which states the green belt should be defended and page 61 clause 3.187 describing the terms of design and visual impact of the site and a harsh demarcation of the green belt boundary to the west of the site should be avoided and appropriate landscaping should be implemented along the western boundary, these clauses have been ignored and we insist that proper consultation be conducted on this issue.

Miscellaneous

5.7 OPA Page 23 Item 7.3 Presence of two undated banked enclosures within the site and a possible medieval moat on site of a world war 2 floodlight emplacement. What remedy is intended?

We, the HRA place on record that items 5.6 to 5.7 are our 'Consultative Objections' - Exhibit No. 17

EXHIBIT 18

NPPF 8.75 Public Footpath

5.8 Protect and enhance public right of way. It is not mentioned as to how this right of way will be protected, and how it will be identified for walkers who may wish to use it.

5.9 Figure 11. 1982 – 1989 Ordnance Survey indicates a broken line with a description of a public path (right of way) leading from the entrance of Malyons Lane across the whole site, the signpost is near the Co-operative store stating that this is a

‘Public Footpath’. We are unable to find this information about the public right of way in the document, and if we have missed this information it needs to be highlighted with a description as to what will be done to protect this right of way if this development is approved.

We, the HRA place on record that items 5.8 to 5.9 are our ‘Consultative Objections’ - Exhibit No. 18

EXHIBIT 19

NPPF 4.29-41

5.10 Transport Impact Assessment – to be provided prior to development .

The Developer is requested to include in their Tender and Outline Planning Application to allow for infrastructure works at their ‘own costs’. We are concerned that there are no assessments or risk analysis of streets/roads in comparison to our own Survey mentioned above. The economic viability becomes a risk for any developer.

At times of flood (very frequent), in Watery Lane, as a result of flood and or accidents, this causes ‘gridlock’ to the whole local traffic system in Hullbridge with catastrophic results.

5.11 Heavy weather will cause additional congestion that will affect some 5500 vehicles etc. HRA survey for traffic accessing Hullbridge along Lower Road/ Hullbridge Road is some 1400 vehicles per hour (including vehicles in Hullbridge) etc. at peak times (7-9.00 am and 5-7.00 pm) of the year.

We are therefore concerned that a proper Highways Risk Analysis has not been done and that the Core Strategy has not provided satisfactory information and does not take into consideration ‘transparency’ as stated in The Localism Act (2011).

We, the HRA place on record that items 5.10 to 5.11 are our ‘Consultative Objections’ - Exhibit No. 19

EXHIBIT 21

NPPF 6 **SITE CAPACITY** (Core Strategy Policy H2 & H3 Cl. 3.159)

NPPF 6.47-50 & NPPF 8.26 SITE AREA DISTRIBUTION

8.1 To accommodate a minimum of 500 dwellings (ITEM 8.28) on Green belt land during a plan period of 2015 to 2026 (Site identified as Figure 12) at a density of 30 dwellings per hectare, plus a flexibility of 175 'Tenure Blind' affordable dwellings. (Cl. 3.162).

This site is classified as a 'sustainable development site' which implies that more Green Belt land will be sought. This is contradictory to the policy of maintaining the Green Belt as stipulated throughout the Core Strategy and by Government Portal statements. This proposed 500 home development will not promote 'Community Cohesion' and we are not convinced that this development will be for our indigenous population, but to accommodate the London 'overspill'.

8.2 The total area of the proposed development site as shown on Drawing 101 of Section 2 of the Outline Planning Application, is approximately 21.25 Hectares and is divided by a boundary separating Rawreth and Hullbridge. Rawreth = 6.953 hectares and Hullbridge 14.297 hectares equivalent to 30.50% and 69.5% consecutively.

Our objection is that the RDC have ignored the clauses in the Core Strategy and the Local Development Framework Documents that boundaries under the auspices of the boundary commission should not be disturbed without the authority of the Commission. Furthermore how were the residents involved in the consultation document in respect of green belt erosion? Page 34 – Option SWH1 – How is the green belt protected if being built upon? And Option SWH2 page 36 which mentions that the site currently suffers from congestion, but this phrase is not mentioned in SWH1- as being a strong defensible greenbelt boundary.

The boundary line has been breached but there is no explanation as to why the RDC are able to ignore this boundary line in which a fair proportion of the land is within Rawreth (30.50%).

Moreover in several letters written to all concerned that the Government had consistently advised the Local Authorities that the use of green belt land should be a last resort, this is completely against the Planning Portals recently referred to. We wonder if the RDC are above the laws of the directives introduced by the Government.

8.3 Identifiable areas SER 6a suggests that 13.60 Hectares can accommodate 250 dwellings and SER 6b suggests that 9.80 hectares can accommodate a further 250 dwellings, a total of 500 dwellings. This is a misconception in density etc.

8.4 HRA have analysed the plan 201, separating the site into A) SER 6a and 6b, but also separating the areas on each side of the boundary line which the Ordnance Survey plans indicate the area in Rawreth = 6.953 hectares (30.5%) approximately and the area in Hullbridge = 14.297 hectares (69.50%). Note the total area calculated 22.80 hectares (excludes pump house and rear gardens which were wrongly indicated on the plans issued by RDC).

NPPF 6

NPPF 150-156 Local Plans Number of properties to be developed on site.

8.5 For the purposes of calculating the number of properties we have separated the areas of development as follows: Each area of the boundary line separation, SER 6a and 6b.

8.6 Further reductions in area includes north west corner of site = 0.94 ha, A bungalow which remains on site = 0.12 ha, A house which remains on site = 0.123 ha and a telecommunications mast = 0.48 ha. A total of 1.55 ha removed from the total area above = $22.80 - 1.55 = 21.25$ hectares.

Area SER 6a = 312 dwellings and SER6b = 212 dwellings. Further division indicates that Rawreth = 121 units and Hullbridge = 403 dwellings

8.7 Why is No. 42 Malyons Lane marked with a blue border on drawing No. F221-102, Item 16 (ownership ?).

8.8 Note: Drawings produced by Cannon who are also piling contractors, are there any piling works contemplated. The reason we point this out is that we were informed by Mr. Taylor of Landhold Capital that piling construction is not necessary. Mr. Carleton's financial assessment included the cost of piling.

8.9 Note: Core Strategy states that SER6a and 6b will produce 250 dwellings in each section. Need to clarify which section will be commenced first. Why is remainder of site allocation (SER6b) not part of application. Are the areas in the north west corner classified as 'additional'.

8.10 Note: There is no mention of demolition of buildings on the site.

We, the HRA place on record items 8.1 to 8.10 are our 'Consultative Objections' - Exhibit No. 21

EXHIBIT 22

AFFORDABLE HOMES

NPPF 6, 16 & NPPF 7.61 and NPPF 150, 153-156 and neighbourhood plans cl. 17 - Core planning S6. 47-54,

8.11 - We were informed that Affordable Homes will not be sited in one location but spread throughout the whole site. It appears that this will not happen and the central high Density area will be used only.

8.12 Page 12. 500 Dwellings, 175 'Tenure Blind' affordable units.

8.13 Our submission forecast a greater volume of affordable homes would be proposed and we are proved to be right.

8.14 Original CS & LDF state 35% affordable homes, now increased to possible 92% when the parcel of land excluded in the extreme northwest corner of the site. The concerning aspect of this is that there is no explanation for this exclusion. Except that we know this land is owned by A N Other and who does not wish to put it up for sale.

8.15 The original documents which still apply as to the quantity of proposed dwellings to be built is 500 of which 35% being 'Affordable' = 175 units.

The Plan considers building clusters of buildings- 27 in number. Refer to Master Plan No. 1 dividing the site into 'Density', 'Section' and 'Area' (Hectares).

8.16 The number of proposed properties total 524 units.

The properties are described as Low, Medium and High density development. Refer to Drawing No 361 (OPA Section 9) which indicates these properties to be 2 and 3-storey in height with average density of 25, 35 and 45 dph.

One area in the extreme north west of the site is outside the boundary marked in a red boundary, and is identified as "Remainder of site allocation land Policy SER6", this was not explained in the LDF document and we consider is highly unusual. An explanation is required as to the status of this parcel of land which will potentially

allow some 19 units to be built has this quantity of units been excluded from the total number proposed.

We note with interest that these are the only 2-storey units proposed to be built on the site. The CS and LDF gives the impression that the whole site would be for sale, but this parcel of land was not explained. It is also unusual that when a site is described in the CS and LDF as to be for mixed residential units but is segregated to show generally 3-storey dwellings.

8.17 We find this plan totally unacceptable and object to the developer's total disregard of the stated requirements of the CS and the LDF, which state that 175 (35%) of the properties should be allocated throughout the development area so as not to encroach on the character of the existing village as a whole.

8.18 The total number of properties per Concept Master Plan 201 are divided as follows:

| SER | Rawreth | | Hullbridge | | Notes |
|---------------|-----------|----------------|------------|------------|-----------------------------|
| | 6A | 6B | 6A | 6B | |
| Low (2 St) | | 19 | | | Not included in development |
| Low (2 St) | | | 3 | | |
| Low (2 St) | | | 23 | | |
| Medium (3 St) | 17 | 82 | | 287 | |
| High (3 St) | | | | 93 | |
| Totals | <u>17</u> | <u>82 + 19</u> | | <u>406</u> | <u>= 524</u> |

The above dwelling distribution is summed up as follows:

| | | | |
|----------------------------------|--------------|-----|------------------------------------|
| SER 6b – Rawreth- Low density | (2 Storey) = | 19 | Owner not to allow development= 76 |
| SER 6a - Rawreth- Medium density | (3 storey) = | 17 | may be flats x3 |
| flrs x 4= | | | 204 population |
| SER 6b – Hullbridge- Low density | (2 Storey)= | 26 | |
| dwellings x 4 | = | 104 | |

| | | | |
|---|-----------------------|-----------|---------------------------|
| SER 6b – Rawreth – Medium Density flrs x 4 | (3 storey) = = 984 | 82 | may be flats x3 |
| SER 6b – Hullbridge – Medium Density | (3 Storey) = 287 | | may be flats x 3 flrs x 4 |
| | = 3444 | | |
| SER 6a - Hullbridge – High Density <u>flrs x4 = 1116</u> | (3 Storey) = | <u>93</u> | <u>will be flats x 3</u> |
| Total population | <u>505</u> (524) | | 5852 |

8.18 (cont

Total units in Rawreth Parish (SER6b) = 99 (121 excludes 19 No. owner not included in development)

Total units in Hullbridge Parish (SER6a) = 406

505

Total dwellings in area SER 6a = 352

Total dwellings in area SER 6b = 153

505

8.19 Population

Existing population = 2011 census = 6586

Original estimate for increase of 500 dwellings x 4 persons 2000 persons = 30% increase.

Hullbridge will change to Town status if proposal approved - 8586

After development the population may increase to 6586 + 6036 = 12622 (91.65%) classified as over populated.

8.20 This proposed development would increase the population possibly by 92%, and will constitute over population.

We are concerned that, the remaining part of Hullbridge (East) will be impacted by the congestion caused by the west.

NPPF

8.21 page 6. item 2.7 to 2.9 – Population profile.

The ONS information given is to 2008 giving a reading of approximately 6200. The Hullbridge Residents Association provided information from the 2011 census indicating approximately 6586.

This population growth shows a growth of 2.5% over the period 2001 to 2011.

The expected population growth, on the original estimate given in our submission in July and September 2013 suggests some 30% increase in population.

However should the OPA be approved by RDC the population will be increased in excess of some 92%. The general principles of the Planning laws, Localism Act and the NPPF suggests there are breaches of the laws and we suggest that the whole OPA is unacceptable and should be rejected "Out of Hand.

8.22 The dwellings now presented on the drawings and plans are totally unacceptable in that it contravenes the basic principles of the CS /LDF and NPPF that 92% of 3-story dwellings will become an eye sore in the village, when only 35% were meant to be 'affordable' dwellings. This development has shown a congestion just to satisfy the 500 dwellings required under the RDC dictatorship, which the RDC and Landhold have obviously held discussions excluding the Consultation that is necessary in the SCI.

We, the HRA place on record that items 8.11 to 8.22 are our 'Consultative Objections' - Exhibit No. 22

EXHIBIT 23

8.23 No garages are indicated for the 2 and 3-storey units.

8.24 Summary of Proposed Development

a) Rawreth area = 118 units. This division not indicated in the OPA, CS or LDF.

b) Hullbridge area = 406 units. This issue is not mentioned in the OPA, CS or the LDF.

c) The CS and LDF indicate two areas consisting of 250 properties each in SER6a and SER6b. Our calculations as measured on the drawing 201 show that the Rawreth area will produce 118 dwellings in area SER 6B and 406 dwellings in area SER 6A.

8.25 Our submission forecast a greater volume of affordable homes would be proposed and we are proved to be right.

We, the HRA place on record items 8.23 to 8.25 are our 'Consultative Objections' - Exhibit No. 23

EXHIBIT 24

NPPF Miscellaneous – Principles of Spatial organisation.

8.26 The aim of fitting in with the character of traditional towns & villages requires for its fulfilment the enclosure of space (by bldg or landscape) ie organising space & buildings in landscaped areas.

Site appraisal must precede or accompany the planning application – where is it?

Sustainability- development should have a mix of residential & employment uses, tenures and dwellings sizes in order to reduce the need to travel. Any residential development around 500 dwellings must incorporate some mixed use development of an employment and/or retail; nature. Sustainability issues must be addressed for developments larger than 1 ha.

EXHIBIT 24 (cont

8.27 Continuity of frontages - In order to enclose spaces & create continuous pedestrian routes, as much continuity of built frontages as possible to be achieved.

Daylight – Housing layouts should be designed to give maximum daylight & sunlight to dwellings, including existing dwellings but not to the exclusion of privacy or the achievement of attractive tree-scape.

8.28 Rear privacy – Where new housing backs onto rear of existing, existing residents are entitled to a greater degree of privacy to their rear garden boundary and where the rear faces of the new housing are approx. parallel to the existing, the rear of the new homes may not encroach any closer than 15m to an existing rear boundary.

We, the HRA place on record that item 8.26-8.28 are our 'Consultative Objection' - Exhibit No. 24

EXHIBIT 25

NPPF 173. Planning Validation.

8.29 Refer to Validation Planning Applications – Planning Validation (Local list & explanatory notes).

NPPF 4.39

8.30 Parking Provision.

Applicants are required to provide details of existing and proposed parking provision including cycle storage and provision and the details shown on a site layout plan.

NPPF 173

Planning Applications – Planning Validation (Local list & explanatory notes). Page 7

8.31 Applications may need to be supported by a statement setting out details of how the applicant has complied with the requirements for pre-application consultation set out in RDC adopted statement of community involvement and demonstrating that the views of the local community have been sought and taken into account in the formulation of development proposals.

We, the HRA place on record that items 8.29 to 8.31 are our 'Consultative Objections' - Exhibit No. 25

EXHIBIT 26

NPPF 6 – Core Planning Principles.

9.1 The Landhold Capital Ltd informed the people at the exhibition that Affordable Homes would not be sited in one location but spread through the site. According to Plan 361, the 3-storey dwellings are all located together and not in accordance with Core Planning Principles given in clause 17.

9.2 We were given to understand that the 'Affordable Homes' (35% as indicated in the Core Strategy and the Land Development Framework), would be 3–Storey units spread throughout evenly amongst traditional 2-storey units.

The items above are in breach of the LDF and are totally unacceptable.

We, the HRA place on record that items 9.1 to 9.2 are our 'Consultative Objections' - Exhibit No. 26

EXHIBIT 27 HEALTH & SAFETY

NPPF 8.69-71 Promoting Healthy Communities.

10.1 The character change to the aesthetics of the proposed 3-storey buildings will separate the old from the new Hullbridge and integration will be difficult to achieve.

Due diligence has been abandoned by no consideration being given to eventual congestion of the properties and corresponding vehicular traffic, not to mention the two-fold increase in the population.

The proposed development if approved will have a distinctive non-cohesive separation of the village and this will be evident from the 3-storey development at entry point of the village from Rayleigh. The view from Lower Road and all the existing properties adjoining the proposed new site will be obvious and create a division in the village. If approved we will lose our Village status to become a Town. If that happened what arrangements will be made for increased services such as Doctors, schools, police, Fire, security etc.

The LPA should take a positive and collaborative approach to development under a Community Right to Build Order, including working with communities to identify and resolve key issues before applications are submitted. This has not happened and we find that 'Consultation' has not taken place, although the RDC have the knowledge of the Hullbridge Residents Association having 98.5% support in this village but we were ignored.

10.2 This and subsequent clauses provides for the Local Planning Authority (LPA) to take a positive and collaborative approach to development under a Community Right to Build Order, including working with communities to identify and resolve key issues before applications are submitted.

There has been no statement from RDC that the 5 year supply cannot be met.

We, the HRA place on record that items 10.1 to 10.5 is our 'Consultative Objections'
- Exhibit No. 27

NPPF 5.44-46 Telecommunications Mast

10.3 Telecommunications Mast not mentioned in supporting documents, although located on plan plus 2 more 'masts'.

With reference from the internet - From the Mast Sanity – Masts Guide the statement reads: Cancer clusters have been found around mobile phone masts up to 400

meters from a mast. This has been the case in Devon, Lincolnshire and Staffordshire.

Our objections are that this may be a health hazard to any households within the given distance, there is no mention of this in the OPA document.

Our objections are that the developer had a duty of care to inform the RDC and the Owner of the land, along with the community who would be affected by the radiation from the Telecommunications Mast. We are aware that there are debates going on about the validity of the hazards, but to keep within the Health and Safety regulations it is advisable to remove the hazard until the final assessments are made to keep the environment safe for the community.

This effectively reduces the number of dwelling that can be built to 33 dwellings in the southeast corner of the site.

According to the guide to mobile Phone Masts, independent scientists and doctors, these are major health hazards. Cancer clusters have been found around Mobile Phone Masts up to 400m from the mast which would encompass the majority of the proposed dwellings. People in close proximity to the mast have received treatment for rare cancers at the same time as each other.

NPPF 8.69 Health Impact assessment. Refer to LDF CI 3.186

10.4 Enquiries at our Riverside Health Centre suggested that the Practice did not have any advance information about this development. The implications can be profound. An increase in the population will mean a proportional increase in Doctors per 1000 patients.

A conversation between LHC and Riverside Clinic revealed that a HUB was offered on the site but without a location. The Practice rejected this offer.

NPPF 8.69 Health Impact assessment. Refer to LDF CI 3.186

10.5 Enquiries at our Riverside Health Centre suggested that the Practice did not have any advance information about this development. The implications can be profound. An increase in the population will mean a proportional increase in Doctors per 1000 patients.

A conversation between LHC and Riverside Clinic revealed that a HUB was offered on the site but without a location. The Practice rejected this offer.

We, the HRA place on record that items 10.1 to 10.5 is our 'Consultative Objections'
- Exhibit No. 27

EXHIBIT 28 HEALTH & SAFETY

NPPF 41. 172

10.6 Public safety from major accidents – close proximity to the village with contractor/ subcontractor vehicles and plant is a fear to the residents, with the possibility of accidents waiting to happen. What guarantees can the Developer give to mitigate such incidents. No such guarantees are stated in the document.

Miscellaneous

10.7 Schools. Although LC seems to explain that their enquiries led them to believe there would not be the necessity for further school places for children as the present school is under capacity, we do not believe the accuracy of their statement and are informed that the present school is full to capacity. We are not certain that the information given top LC is sound. There will be say 10% of the new entrants to the village may have children of school age and assuming there will be an increase in the population of the basic 500 x 4 per family which equated to some 2000, the additional requirement for school places will be 200. We are confident that the school will be unable to sustain that level of increase.

We, the HRA place on record that items 10.6 to 10.7 are our 'Consultative Objections' - Exhibit No. 28

EXHIBIT 29

NPPF 10.100-103, Tech Guide 2.2-19

11.1 Area of flood agreed by our submissions – 150 homes reduced from 500, but the density increased by 3-storey buildings to take into consideration number of homes lost due to our objections to build on flood plain but density being increased to high level to take account of the loss of 150 homes as mentioned above.

Attenuation Tanks

11.2 Where Attenuation tanks are provided in areas shown, ground water will tend to back up and increase flood zone which will inevitably require all development to have piled foundations.

11.3 In the centre of the site there is shown a proposed attenuation basin next to a proposed local equipped area of play for children (accident prone). These basins will no doubt be full for the majority of time especially when calculated for a 1:1 year annual probability storm, together with the amount of additional surface water run-off due to extra impermeable surfaces from the development which would also add to the volume of water in these basins etc. especially as DEFRA have now opted out of introducing Sustainable Drainage Systems SuDS compulsory legislation.

11.4 Underground attenuation tanks are proposed by the developer – calculations suggest that the impervious areas from the new proposed development will generate some 1250 cu. m (minimum) which equates to 1,250,000 litres (275,000 gallons) and could be up to 3000 cu. m or 3,000,000 litres (660,000 gallons) of water which the applicant state will discharge into an existing watercourse, this will cause further flooding.

The underground tanks being approximately 1000mm below ground will also cause the existing ground water to 'back up' into the site causing further flooding.

11.5 Please provide us with your success in building this elsewhere.

NPPF 2.2-19- Flood Risk. 10.101-104 Technical Guidance.

11.6 Inappropriate development in areas at risk of flooding should be avoided. We suspect that the assessments made of flood susceptibility are inadequate and we are adequately capable of entering into debate on this question with both the RDC and the developer to ascertain the viability of the statements made.

Per application form

11.7 Section 12 – Flood assessment – 4th Q – 'will proposal increase flood risk elsewhere – answer should be 'yes' (not 'no') Possible additional minimum 275,000 gallons of water from impermeable surfaces. Where is the existing watercourse and will it be capable of additional water distribution?

An assessment report will be useful to clarify this statement.

NPPF Tech. Guide 2.2-19

11.8 Page 13 Clauses 3.4.10 and 3.4.11 Surface Water flood risk is clearly a concern in the District and there is an increasing need to consider the impact of rising sea levels as a result of climate change on the discharge of surface water runoff to tidal systems.

The use of the environment Agency 'edition' of the Areas Susceptible to Surface Water Flooding dataset called the 'Flood Map for Surface Water' was recommended

NPPF2.2-19

11.9 This 'site' is classified as 'sustainable Development' over a period of 12 'disruptive' years, as presumed under clauses 1.30 to 1.32, there is no proper description of a Risk Analysis in respect of flood, refer to National Planning Policy Framework (page 12).

11.10 A document set out by Aviva describes the site as being partially susceptible to flood, but the threat of flood changes annually. The Core Strategy does not indicate the regularity of monitoring or Risk Analysis.

We, the HRA place on record that items 11.1 to 11.10 are our 'Consultative Objections' - Exhibit No. 29

EXHIBIT 30

NPPF Miscellaneous Property Insurance

11.11 The potential Property Insurance costs against 'flood risk' and 'subsidence' in this area, can range from £2500 to £5000 per household

An exercise on Post Codes SS5 reveals that using the 'Hawkeye' system determining the level of associated risks such as flood, subsidence etc., the combined results show that in both instances, Subsidence is Red, meaning these are perils which will either be excluded or a large excess applied in respect of subsidence – usually £2,500.00 (£1000.00 being 'Standard').

And for any areas susceptible to flood, no protection barriers or flood defences will increase the Cost Risk to £5,000.00 per property making 'flood excess' a priority and no claims accepted by the Insurance Companies if this criteria is applied to development in flood areas.

Both results also show that these areas are at risk of flood – the analysis indicator said ‘Yes’ to ‘Flood Proximity Risk’.

We are warned of ‘exceptional costs’ of developments, without the inclusion of ‘Flood Defences’, will prohibit the selling prices and letting prices generally, making the Development financially nonviable.

Insurance Companies are doubtful that flood would be excluded altogether, but this could change in the future, and they have already seen certain areas go from ‘green’ to ‘red’ within 1 to 2 years.

11.12 A document produced by Scott Wilson of 6-8 Greycoat Place, London SW1P 1PL for Rochford District Council labelled “Strategic Flood Risk Assessment”, levels 1 & 2, on page 12, clause 3.4.9, when mapped against the national property database Defra, reports that 50 properties are estimated to be susceptible to surface water and pluvial flooding in Hullbridge Table 3-4.(Defra 2009).

We are also concerned that not enough consultation has taken place with the Fire Service regards flood or emergency services in respect of this village.

NPPF Home Insurance

11.13 A memorandum of understanding is under review with the aim of entering into an agreement in principle between UK Insurers and the Government to develop a not for profit fund known as Flood Re to ensure that flood insurance remains affordable and available to home owners at a high risk of flood, with a target date of summer 2015. However homes built after 1st January 2009 will not be covered (as applied under the old Flood Insurance Statement of Principles), this is to avoid encouraging unwise building in flood risk areas. In addition the agreement would also exclude buy to let landlords or holiday lets and leasehold properties, of which there are currently 840,000 deemed at a risk of flooding. If flood insurance is not available or becomes prohibitively expensive it could result in mortgages not being available with a consequential difficulty in buying or selling property.

NPPF 11.123 Noise Assessment

11.14 If this proposed development is approved it will raise issues on noise and disturbance.

Applications for developments that raise issues of disturbance by noise to the occupants of nearby existing buildings and for developments that are considered to be noise sensitive and which are close to existing sources of noise, should be

supported by a noise assessment prepared by a suitable qualified acoustician.
(Refer to Planning policy Guidance 24; Planning & Noise (September 1994).

We, the HRA place on record that item 11. 11 to 11.14 is our 'Consultative
Objection' - Exhibit No. 30

EXHIBIT 31

11.15 Extracts from letters received from residents.

Flood defences. (By Pat Moore)

A newspaper article suggested £1bn annually to stop flooding.

Flood defences need £1bn annual budget till 2025 to prevent a repeat of last winter's
flood chaos.

The Association of British Insurers is leading the group's call for "Zero Tolerance
Approach" to stop building on flood plain

A £2.3 Bn six year programme announced by the government is aimed at protecting
300,000 homes.

N.B. Watery Lane was closed on 19th August for 3 months and the repercussions
were obvious with traffic congestion affecting Rayleigh and Rawreth trailing back into
Hullbridge.

11.16

Watery Lane (Excerpt from Peter Moore)

Driving through Watery Lane there was water in many places (15 January).

In the last year Watery Lane has been closed quite frequently, the question is did the
respective agencies or the developer do any assessments or reports.

How can anyone build homes on a flood plain, it beggars belief, obviously by political
dictates!

A report suggested that engineers had done some bore holes on the site and found
water only 100mm below the surface. It will be interesting to see the assessments
made via the Flood Forum and the environment agency.

The Councillors or developers will not have to live there so why should they care.

The traffic problems just exacerbate the situation as reported elsewhere in this
document.

The southern end of the site is advised as flood plain therefore no developments should take place in this area.

11.17 Watery Lane. (By Jeffery Attfield)

Hullbridge being some 200 ft. below Rayleigh and set in tide-locked River Crouch valley, Watery Lane receives violent surges of water runoff distributed and aided by local ancient watercourses. When this takes place the lane is flooded from surrounding water courses to a depth of 300 to 1200mm along a stretch of 2 to 300 yards completely cutting this route off. This happened 25 times in the last 5 years (Essex Constabulary Data). It is ancient flood plain. On one occasion it was closed for 10 weeks without any statutory authority solving the problems it causes. Watery Lane is used as a major short cut for this south east area large volume of traffic and causes overload and major gridlock in the Hullbridge/Rawreth/Rayleigh unclassified country road network. These roads are still primary farm roads and not designed to take large volumes of traffic and certainly not large articulated lorries, which have had to be rescued from time to time. Various half hearted attempts have been made to rid the Lane of floodwater but have failed miserably over the years and without any long term solution.

As there is no mention of any works to Watery Lane and if this development is approved Hullbridge will suffer greatly. Watery Lane has been mentioned many times in the media and in the submissions and asked for the Road to be classified as at least a 'B' road and the Planning Inspector did recommend that the Lane be considered for improvement, but there is no word from Essex County Council /Highways in this respect.

Watery Lane is the only logistical local route connecting to the North of Essex road network and is used by most of the villages in the east of Hullbridge, due to congestion on the major roads from Southend. It seems the Local Authorities seem to deny the problem exists as they do not live here.

The Environment is in control of us, not the other way around affecting all aspects of life, so much for the strong words used in the Core Strategy and Local Development Framework, that the ecological aspects of life MUST be given priority of thought at preplanning stages, and indicated in all the documents. We have not seen any "Pollution Assessments" or predictions that this must be looked at in earnest as we are a self contained village with only one way for access and ingress.

The Southend Airport, although good for the local economy also has a big traffic problem to contend with and Hullbridge is an obvious relief for traffic movement.

The Essex Constabulary neighbourhood police office has recorded, over a 5 year period (1/1/09 to 15/3/14) 256 incidents in Watery Lane which equates to an average of 51 per annum, the cost of this to the Constabulary would be interesting to note, now extend this situation over a 12 year programme of development work, you will visualise the impact this proposed development will have on Hullbridge.

We, the HRA place on record that item 11. 15 to 11.16 is our 'Consultative Objection' - Exhibit No. 31

EXHIBIT 32

11.18

As stated many times before there are 11 'Brownfield sites' very capable of providing the accommodation needs of the village without affecting the ecology of this area.

RDC need to consider the local environment including Hockley, Rayleigh, Rawreth and Hullbridge, as combined, have a traffic problem now which will only get worse during and when the proposed development works are complete in 12 years time. Our calculations suggest that the 3 areas mentioned above equate to some 38% volume of dwellings proposed to be built (some 1800 of 4700 number dwellings in the whole District) and as mentioned before Hullbridge will lose its village status and become a town.

There is the question of 'pothole repairs' to be considered and we suspect only a fraction of the road tax is spent on roads (perhaps forgotten by the local authorities and Government. We read all sorts of stories on potholes in the media but perhaps the authorities should ask China and India to return a couple of Billions of Pounds (probably a small percentage of tax payers money) to be returned to fill this 'gap' in our economy.

We, the HRA place on record that item 11.18 is our 'Consultative Objection' - Exhibit No. 32

EXHIBIT 33

NPPF 6

13.1 We note that this plan No. 321 is a revision H, we have not had the opportunity to view the previous revisions, therefore are unable to make comments, which goes against the principles of Statement of Community Involvement (CSI).

13.2 The extent of the planning application has changed from the original stated in the CS or LDF, therefore understandably the site area has diminished from 23.4 Hectares to 21.79 hectares, but the diminishing area has not been explained or discussed in the OPA document.

13.3 The Remainder of site allocation land (policy SER6) – The excluded area is also mentioned in our clause 1.2 to 1.4, 1.2.4 (reference drawing No. 351- Section No. 1, Plan No. 101- Section No. 2, concept Master Plan 201).

This part of the drawing does not show the split of the site as SER6a and 6b. As the chairman had made a submission in September 2013, this was on the basis that the two areas would be developed to provide 250 dwellings per area. There is no mention that the area had been re-designated to provide the 500 dwellings without discrimination of the area SER6a and 6b and also the area which is adjoining Rawreth area.

We, the HRA place on record that item 13.1 to 13.3 is our 'Consultative Objections' - Exhibit No. 33

EXHIBIT 34

NPPF 4 HIGHWAYS

13.4 The plan shows the spine road exit towards Malyons Lane is much wider at the joint entry to the site than the existing Malyons Lane, this will have some implications on access and ingress to the site, we maintain this will cause congestion in this lane and possibly tensions between the existing and new householders.

The OPA does not provide an explanation as to how the developer can minimise the problems that are bound to be prominent. In contravention of the Essex Design Guide.

We, the HRA place on record that item 13.4 is our 'Consultative Objection' - Exhibit No. 34

EXHIBIT 35

NPPF 99-103 and ENV 9.6

13.5 Landscape and open space including SuDS. We refer to our statement made in our letter to RDC and Landhold Capital that the area closest to the Hullbridge Road/ Lower Road, coloured green and grey was an area within the whole area of the site designated to be developed within an area of 23.4 Hectares. Our statement was made after the exhibition presented by Landhold Capital, when our Chairman Mr. B. Marsden-Carleton spoke with Mr. Robert Taylor, the Planning Director of Landhold Capital, in front of witnesses (part of the HRA committee), that in view of the area designated as stipulated above will mean that approximately 150 dwellings would be removed from the number (500) of dwellings to be built. Mr. Taylor agreed. Which means that the number would be reduced to 350 dwellings. However some time later, we read in the Echo newspaper that Mr. Scrutton (Head of Planning and Transportation) stated that the number of homes would remain as 500. What is now obviously clear is that the developer, without consultation, decided to plan for a majority of 3-storey dwellings, in contravention of the restrictions placed on the development by the CS/LDF and the NPPF.

We, the HRA place on record that item 13.5 is our 'Consultative Objection' - Exhibit No. 35

EXHIBIT 36

NPPF 11.121

14.1 Our examination of this section leads us to section OPA 4 of this report – Geology, Hydrology and Hydrogeology, particularly item Page 5. 4.1 data – Closest Surface waters – A primary river has been identified approximately 30m to the south and south west of the site, part of the River Crouch Network.

We are unable to identify this on the plan therefore have no opportunity to establish fact.

14.2 As above but for the following item – Surface water Abstractions within 1000m-1. 921m SW: point source used for top up purposes – usage not known. If a survey was conducted why is this information unknown.

14.3 As above but the next item. Ground water abstraction within 1000m. No groundwater abstractions have been identified within 1000m. This area is in regular flood, if the survey/abstractions had been conducted the developer would have had a result.

14.4 Page 5 following from above. Mining extractions and natural cavities- Table 5 – Summary of activities. At a distance of 900m north a Hullbridge Brick and Tile Works was evident. Although it is mentioned as ‘ceased’, a survey, if conducted, may have found a section of ‘made up ground’.

14.5 Item 5.3 Table 9 page 6- Pollution incidents summary.

A statement made that 120m West. Sewage impact to watercourse in 2002 and 345m North East. Fuel leakage in 2001. We wish to question how this was dealt with to at least provide a remedy to safeguard the area from pollution.

Note: Phase 1 is mentioned but where is Phase 2?

We, the HRA place on record that items 14.1 to 14.5 are our ‘Consultative Objections’ - Exhibit No. 36

EXHIBIT 37

NPPF – Introduction page 1, Clauses 1 & 2. Core Planning Principles- Clause 17.

15.1 This document was produced by Phase 2 Planning- who has the ultimate responsibility?

What agreement has been struck between the principle ‘players’ in this development?

15.2 We want to know what the relationship is between the principle ‘players’ in this development

15.3 According to the Landhold Capital website we understand the site has been bought by Landhold Capital, we need confirmation or denial from all concerned.

NPPF 173 Plan Making- Viability and deliverability.

15.4 The Applicant has not provided proof of Viability and Deliverability- proof of costs and timescales as described in this section without proof that they can deliver within the deadline of 2021.

A necessary and proper prequalification would have provided evidence that the Company is viable to commit to a development of this scale.

Our prequalification letter bears witness that no answer means that they are unable to, and therefore are probably not adequate to provide the deliverability or viability to satisfy the rules and regulations which apply to this proposed development.

15.5 The Applicant has not provided proof of Viability and Deliverability- proof of costs and timescales as described in this section without proof that they can deliver within the deadline of 2021.

A necessary and proper prequalification would have provided evidence that the Company is viable to commit to a development of this scale.

15.6 Why has RDC been so reluctant to ask for proof of Viability and Deliverability- proof of costs and timescales as described in this section and without proof that they can deliver within the deadline of 2021.

We, the HRA place on record that items 15.1 to 15.6 are our 'Consultative Objections' - Exhibit No. 37

EXHIBIT 38

16.1 The Core Strategy indicates that the Watery Lane/Hullbridge Road junction and Malyons Lane will be access points to the proposed new development.

The core strategy does not state what infrastructure works will be done to alleviate the roads congestion problem. This questions whether any 'Risk' analysis and traffic count has taken place

The writer produced a Road/Street 'Risk Survey' (see Addendum 2) indicating the potential risk to 26 Streets, all being directly affected by the development.

We, the HRA place on record that item 16.1 is our 'Consultative Objection' - Exhibit No. 38

EXHIBIT 39

17.1 Watery Lane – no proposals to make the necessary improvements – check highways plans. Bus stop near Watery Lane (coming in to Hullbridge) not shown on drawing, possible problems not discussed?

We, the HRA place on record that item 17.1 is our 'Consultative Objection' - Exhibit No. 39

EXHIBIT 40

NPPF 8 99-103

DRAINS – NPPF 47 schedule 3

19.1 Surface Water – The Surface Water Easement shown off Malyons Lane parallel to Elm Grove needs to be minimum 6m wide and requires a larger buffer to give the required sensitive interface between existing gardens and the new properties.

We, the HRA place on record that item 19.1 is our 'Consultative Objection' - Exhibit No. 40

EXHIBIT 41

Sustainable drainage systems;

NPPF 99-103

19.2 The existing drainage system needs substantial improvements prior to any links being provided to the proposed new development and should be part of the necessary Infrastructure works.

We have received information from residents explaining drainage blockages due to lack of due maintenance at Keswick Avenue, The Drive, Monksford Drive, The Priors and Abbey Road to name a few.

19.3 Page 60. CI 3.185 Mains connection to the proposed new development is stipulated as funded by the developer. We believe that the developer will find a way to include it in his costs, this cost being reflected in the 'sale' value which the buyer will have to pay.

19.4 No buffer is shown between the existing properties in Harrison Gardens and the new development as stated in LHC exhibition would be the case in their vision and Design Principles

By Jeff

19.5 Foul Water Drainage

In 1968 Councillors stated that Hullbridge sewerage was only designed for 3000 property connections.

The 1970 era saw an embargo put in place by RDC to stop any further development in Hullbridge because the sewerage system could not cope, due to overloading.

1971 -1974 continual foul sewage flooding Keswick Avenue, Burnham Road and surrounding area (discharging into surface water open field boundary ditches) causing a health hazard due to the area being bounded by a public footpath leading to the River Crouch.

RDC later twinned the foul sewer where it ran across a field in an attempt to eradicate this problem. It was a short term solution. To date the storm cells have replicated the past with foul water sewer surcharges. It would indicate that the whole system needs redesigning to the north east of Hullbridge.

NPPF 47 schedule 3

19.6 To Date these problems still exist on the Hilltop Estate because of overloading, caused by recent storm cell surges of surface water rapid run off, (unmade roads surface water flooding in the locality which has found its way into the foul sewage system). The pumping station in Kendal Park, Hullbridge, situated at the lowest gravitational point on the south bank of the tidal river crouch is being overloaded once again with this extra surcharge and could not cope.

The recent explosion and fire at the attached power station may indicate that the power supply at the electrical substation was not sufficient for its loading. In 1977 the Southend Standard published an article on the public outcry of the stench of raw sewage emanating from cesspits in the north west of Hullbridge, including the Riverview Gardens (an extension of the Drive), Creek View Avenue, The Esplanade and Alfreda Avenue. This area had residents complaining of the smells. Untreated sewage was claimed to be running into the open ditches, gardens, roads and on to nearby fields. This was evidently the higher ground properties causing discharge towards the river Crouch, flooding through the lower positioned properties.

The area has since been connected to main foul drainage helping to overload the existing system, flowing into the overloaded sewage pumping system as mentioned before.

19.7 Many people complain of neglect by the Councils for repairs and maintenance citing lack of funds.

We, the HRA place on record that items 19.2 to 19.7 are our 'Consultative Objections' - Exhibit No. 41

EXHIBIT 42

NPPF 10

19.8 Suggested standard planning conditions relating to design matters in addition to normal conditions which should be imposed even on Outline Approvals.

1. All electrical and telephone services to the development shall be run underground.
2. All services intakes to dwellings, apart from gas, shall be run internally and not visible on the interior.
3. All meter cupboards to be positioned in accordance with previously submitted details & approved by the local planning authority.
4. Satellite dishes shall not be fixed to the street elevations of building or to roofs.
5. The rights of utility companies to *demand* ?? consent under the General Permitted Development Order to construct electrical substations & gas governors within the development are withdrawn & planning consent required.
6. Details of street lighting lanterns & columns shall be submitted & approved by the local planning authority prior to their installation.

We, the HRA place on record that item 19.8 is our 'Consultative Objection' - Exhibit No. 42

EXHIBIT 43

NPPF Miscellaneous Preparatory and enabling works

19.9 We are convinced that the preparatory and enabling infrastructure works necessary prior to any new development should include the existing state of the

infrastructure work and also include the necessary 'flood' defences and improvement of Watery Lane. To that extent we are not satisfied that enough consideration has been given to these issues.

19.10 We have un-adopted roads making access difficult for the Fire, Police, Ambulance services and general deliveries. The Community find it difficult to believe, that the Council or Developer will take this issue seriously although it is clearly mentioned that the Developer must take responsibility for the 'infrastructure'.

We have letters giving so many instances of neglect by the District Council and Parish Council for repairs and maintenance citing lack of funds.

We, the HRA place on record that items 19.9 to 19.10 are our 'Consultative Objections' - Exhibit No. 43

EXHIBIT 44

NPPF – Introduction- P1, Cl. 1& 2- Core Planning Principles- Cl 17.

Refer Page 7.Clause 1.21 Allocations Submission Document – November 2012

20.1 The Community of Hullbridge is disillusioned that a proper explanation has not been provided by the District or Parish Councils to allow a dialogue between the whole community to distinguish between the advantages and disadvantages.

To this extent we suggest that this clause has been disregarded by the District Council for the reasons mentioned above.

20.2 We are now a Community of robust energy, the numbers on our "Resident List" demonstrates our determination to improve our village in a most accommodating manner to satisfy all our Residents requirements.

We, the HRA place on record that items 20.1 to 20.2 are our 'Consultative Objections' - Exhibit No. 43

EXHIBIT 44

NPPF 4

Transport Assessment

21.1 Planning policy Guidance 13 Transport (March 2001) that a TA be submitted as part of the planning Application where the proposed development has significant transport implications. The coverage and detail of the TA should reflect the scale of the Development and the extent of the Transport implications of the proposal.

21.2 The CDM Rules insist that this be administered by the Health & Safety Executive which means pre-notification and to develop a Traffic Management Plan for review and approval.

The plan should cover a traffic management method of access and egress including all limitations – deliveries (outside rush hours), This should include the site traffic being required to work outside the rush hours including numerous delivery lorries and muck-away lorries.. Not forgetting the cleaning equipment necessary to clean the roads after site traffic use..

The programme must include for Community involvement in consultation with the HSE.

We, the HRA place on record that items 21.1 to 21.2 are our 'Consultative Objections' - Exhibit No. 44

EXHIBIT 45

NPPF **3.28** Encourage Economic Development, skills, Employment and Enterprise.

22.1 This proposed development gives us short term economic advantages only. However there is the danger that inward employment will be insufficient to keep the economic interest sustainable.

Longer term, the nature of the development being only dwellings, we see a disadvantage after completion, the assumed high level of Economic development will disappear.

We, the HRA place on record that item 22.1 is our 'Consultative Objection' - Exhibit No. 45

EXHIBIT 46

NPPF 150 Local Plans.

23.1 The poor quality of the OPA does not fill us with confidence that the developer will be able to deliver the development that reflects the vision and aspirations of the

local communities. The principles of the NPPF are pertinent to the production of the policies therein and the above issues set out for your and the developer's attention would certainly not win a prize from the 'dragons den'. With all the anomalies found in the OPA we are sure you will agree that this OPA should be rejected 'out of hand'.

We, the HRA place on record that item 23.1 is our 'Consultative Objection' - Exhibit No. 46

EXHIBIT 47

NPPF 9 Housing Clusters

23.2 There are no policies set out that will restrain the number of separate developers or builders in the proposed development of the site.

Our investigation into the methods adopted by Landhold Capital and, by implication, the same may apply to the Developer namely Southern & Regional Developments Ltd show that the clusters may support several developers to construct the buildings consecutively for the purposes of speedy conclusions of completions to satisfy the incentives promised by the Government for each property will affect rental income.

Several clauses above will set up fear in our village, by impact of material deliveries, constant workmen traffic parking and consequential noise. The Core Strategy and the Local development

framework suggest the duration will potentially be for 12 years.

The Hullbridge Residents professional expertise forecasts that with the aspects of the flood potential of the site we suspect there will be the need for piling.

Should you, in your wisdom consider that piling is not necessary we think that the final building certificates, if given by the RDC, and we have heard of stranger things happening, may present problems for **Insurance** purposes and will affect the sale or rent of the properties.

We, the HRA place on record that item 23.2 is our 'Consultative Objection' - Exhibit No. 47

Further comments

Have had the opportunity to view some of the amendments made by the developer to the original application and are concerned that in accordance with the regulations and your advice that we would be consulted when any amendments were being contemplated by the applicants but that consultation has not taken place. According

to the planning regulations, if any changes are made to a planning application following response to consultation or representations from the public or statutory authorities, the case officer should negotiate with the applicant to make amendments to the original proposal. Revised plans should be made available for consultation to all within 24 hours of receipt.

Where changes are not considered to be minor further public consultation should be carried out asking for further comments to all parties. The changes made to the original outline planning application are definitely not minor as they deal with access and infrastructure which are not subject to reserved matters. We see that many of our concerns are being addressed by the developer without our involvement, which is regrettable. But we note that existing infrastructure is not being addressed.

Request notification of our participation in consultation before your intended Development Committee public meeting to allow our perusal of the proposed amendments which is our right in accordance with the Local Development Framework / Core Strategy Regulations and allocation document.

Again remind you to observe the 10 guiding principles as advised in our letters which are: Clause 1 – the merits of democracy, Clause 2 – Council's need communities, Clause 5 respect to communities, Clause 6 Freedom of information is a right and Clause 10 communication and consultation is a two way process.



Christine Lyons
Assistant Director, Planning Services

Relevant Development Plan Policies and Proposals

Rochford District Council Local Development Framework Allocations Plan Adopted February 2014

SER6a, SER6b.

Rochford District Council Local Development Framework Core Strategy Adopted Version (December 2011)

Policies RTC3, RTC2, ED1, T8, T7, T6, T5, T3, T2, T1, CLT10, CLT8, CLT7, CLT6, CLT5, CLT4, CLT3, CLT2, CLT1, ENV11, ENV10, ENV9, ENV8, ENV5, ENV4, ENV3, ENV1, GB1, CP1, H6, H5, H4, H2 and H1.

Rochford District Council Local Development Framework Development Management Plan adopted 16th December 2014.

Policies DM1, DM2, DM4, DM5, DM16, DM25, DM26, DM27, DM28, DM29, DM30 and DM31.

Parking Standards: Design and Good Practice Supplementary Planning Document adopted December 2010

C3

Rochford District Council Local Development Framework Supplementary Planning Document 2 Housing Design (January 2007)

Department of Communities and Local Government. Technical housing standards – nationally described space standard. Adopted March 2015.

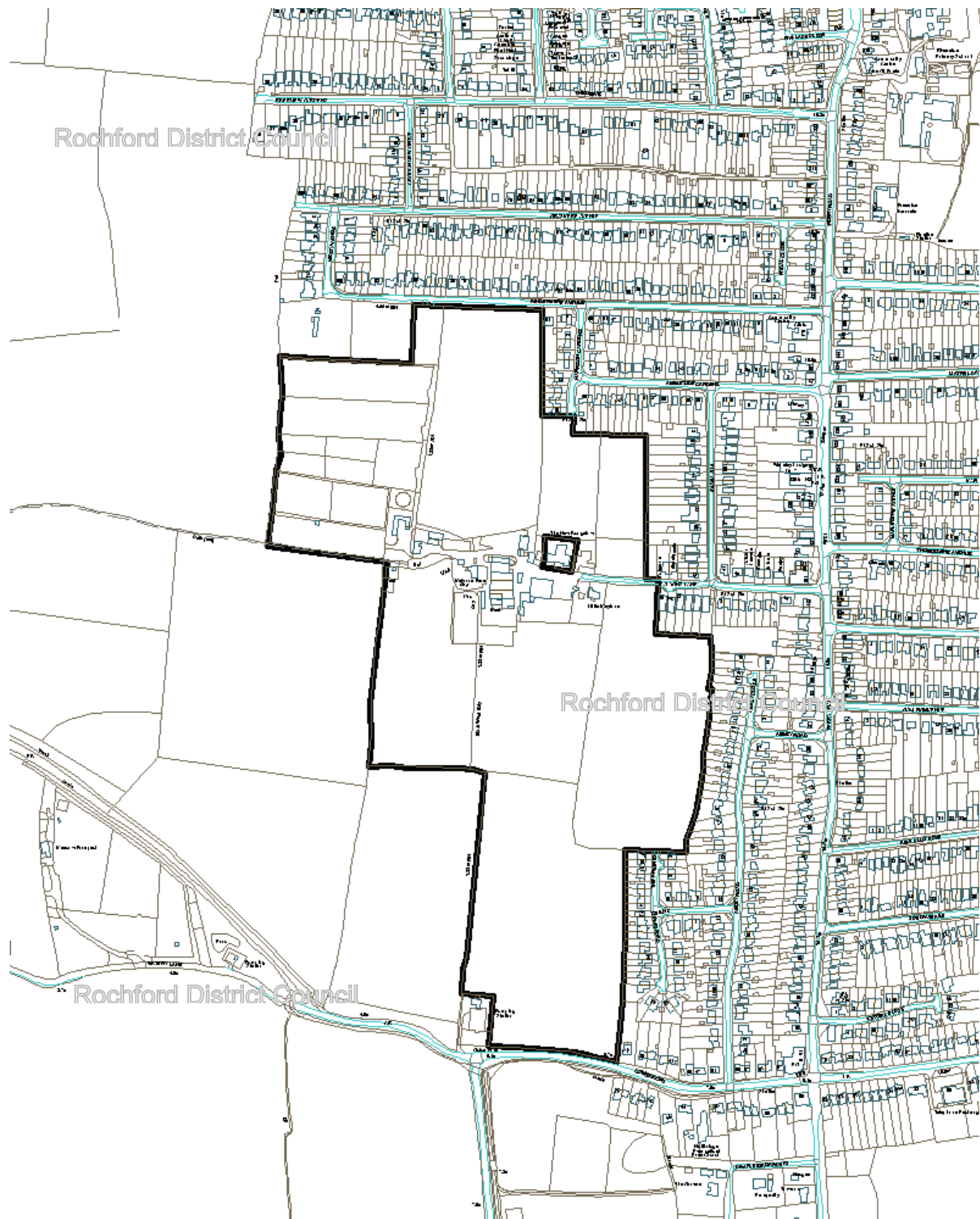
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