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Local Plan – Regulation 18 Responses

Q.1. Spatial Strategy.

YES. In principle we are in agreement but with recognition of the following points.

We wholeheartedly support the approach which recognises the unique qualities of the area rather than taking on given expectations of building levels without question. This includes as highlighted, the ONS projections, the age profile of the community leading to demand for housing and the specific landscape of the area. Equally the view that 'environmentally and infrastructurally deliverable' considerations must be considered.

We have concerns regarding the Higher Order Settlements referred to in 1b which might include Hullbridge and Great Wakering (Settlement tier 2). Please see comments on road infrastructure below regarding this.

However, despite our agreement in principle, significantly more emphasis needs to be placed on infrastructure we feel. As residents of Hullbridge we are hugely concerned about the current situation of our road infrastructure. We effectively have one main road from Hullbridge to the next main town, namely Rayleigh. This road also feeds traffic from Rochford and Ashingdon and is already extremely congested at peak periods. The increased traffic projections from proposed new developments are always unrealistic and we have seen a significant increase in traffic from the developments in Rochford in addition to those in Hullbridge itself. Developers take no account or responsibility for the roads and we are left with damaged roads due to the increased traffic and lack of repair from ECC which are becoming increasingly dangerous. How is this factored in? Watery Lane now acts as a main road at peak periods and is also increasingly dangerous due to the volume of traffic and lack of repair. The road networks are and must be a primary concern. Working families are highly unlikely to use the bus to get to work and therefore cars must be considered.

Additionally, there is very limited variety in the range of properties built. Based on age profile there should be an expectation for more bungalows and age-appropriate buildings. These are non-existent. If the older members of the local community had more appropriate properties available then they may choose to 'downsize' and then family homes would be freed up. Equally, smaller homes for first time buyers should be more evident in new developments. Finally, affordable homes should be exactly that as at present they are still not affordable to many first-time buyers.

Equally further consideration should be given to education and health service impacts. There is little or no provision for additional school places within the new developments and even if

the money is made available to expand current schools this will create very large primary schools which is very unlikely to be beneficial to the youngest pupils but will also create further demand on the roads as families will need to drive their children to school rather than walking to locally situated schools (which has been the government's long term aim for a very long time). The same applies to healthcare provision and with our aging population this has to be a significant concern.

Q.2. Green Belt.

YES, we agree with policy MG2 as it aims to maintain the 'objectives of the green belt'. However, our concerns are, that despite the laudable aims of the policy, we can all see that settlements are in fact already becoming joined through new developments and in our own local area two developments are currently being discussed - namely Lubbards Farm and the Rayleigh Club. If these were to go ahead they would be significantly reducing the gap between Hullbridge and Rayleigh even further, which the policy states it wishes to avoid - see 4.2.1.

Q.3. Health Impact Assessments

YES. In principle we agree with this policy however real-life experience indicates that this is not happening on the ground. Whilst the aims of this are secure, greater accountability needs to be placed upon developers and greater scrutiny and enforcement of their outcomes needs to be given as promised playgrounds etc are not always provided as we all know. This is actively damaging to young families - a proportion of the residents you are aiming to support. Equally as there is distance to existing schools and medical centres and new facilities are not included, this encourages greater car use. This in turn creates poor habits (car over walking) to the youngest in our communities. These factors CANNOT support the health of our communities and may create poor habits which may damage health long into the future. This is a huge concern.

Pollution is a concern regarding the health of the population. The poor state of our river Crouch due to raw sewage discharges is not monitored by the environmental agency and Anglian water are not currently able to fully deal with the current sewage load at their treatment works, it's not clear that they could adequately deal with the increased load caused by a considerable increase in housing units.

Q.4. Developer Contributions.

NO. Whilst the policy appears to be aiming to ensure that developers pay for or towards required infrastructure, we do not agree that it has sufficient clarity or accountability built in.

Even now, when speaking to representatives of a potential new development, they were asked about local transport arrangements and the potential impact on local roads, residents were brushed off and told, "That's Essex CC Highways responsibility!". Similar comments were given in regard to other essential services such as Education, Healthcare and Utilities. This attitude follows through with the houses being built but the shared amenities not always being completed. The developers MUST be made to see that this essential shared infrastructure is THEIR responsibility and this MUST be delivered prior to the houses. This would negate the issues around 'viability' of these issues at a later stage.

We feel that expectations need to be made absolutely clear to the developers at the outset and that far greater enforcement of those expectations must be undertaken.

Q.5. Addressing the Climate and Ecological Emergency.

Yes. Hullbridge Parish Council agree with Policy SC1. We would wholeheartedly agree with the statements contained within **Summary of Consultation Feedback** (Para 5.1.3). We would particularly identify the importance of compliance with Policy SC1, Paras 1(a) to (h) by developers. We would expect and hope that RDC would be robust in their examination of all future development plans in this regard.

Q.6. – Operational Energy and Carbon (Net Zero) in Homes and Buildings.

Yes. Hullbridge Parish Council agree with Policy SC2. We would also agree with the statements contained within **Consultation Summary** (Para 5.1.16), that the current building regulations are not good enough in responding to climate change concerns. Furthermore, we would like to see a further endorsement to SC2, Para 2(b) that would require only energy from other renewable sources such as Wind Generation, Heat Pumps etc, not just Solar.

Q.7. – Embodied Carbon and Circular Economy in Homes and Buildings.

Yes. Hullbridge Parish Council agree with Policy SC3. We would also be particularly keen to see a vigorous application of Para.2 of this policy.

Q.8. – Renewable and Low Carbon Generation.

Yes. Hullbridge Parish Council agree with Policy SC4. Hullbridge Parish Council would very much support the proposals set-out in Para.1 of the Policy, as it does Paras. 2 and 3. We hope that RDC would rigorously enforce **ALL** its aims and objectives, as set out in this Policy.

Q.9. – Local Environmental Impacts.

Yes. Hullbridge Parish Council broadly agree with Policy SC5. Whilst we acknowledge the significant negative impacts of Noise & Vibration and Land Contamination, Hullbridge Parish Council most especially concerned about (a) the steadily increasing levels of air pollution, (b) the increased effects of light pollution and (c) increased levels of odour.

Detrimental levels of air pollution is largely, albeit not exclusively, due to the steady increase in levels of vehicular traffic using Lower Road, Hullbridge Road and Watery Lane/Beeches Road, as a direct consequence of housing developments taking place to the east of Hullbridge. This is supported by the recent Traffic Assessment (Regulation 18) document. Any further developments, including those within our jurisdiction, will present an even greater negative impact on the community. We emphatically endorse the objectives set out in Para1 of this policy and would expect vigorous enforcement of its aims and objectives.

We also have serious concerns relating to heightened levels of Light Pollution causing serious negative impacts on residential amenity in particular. Additionally, although some 15 Kms (c.8) away from the London Southend Airport, residents are very much concerned that the additional light pollution generated by literally thousands of potential homes across the district, may present problems for aircraft approaching the airport. We are cognisant that the Airport Authority has raised similar concerns themselves.

We are anxious about increased levels of odour emanating from the Sewage works along watery lane, which is struggling to cope with current levels of sewage. Quite frankly the plant simply could not cope with any additional sewage generated from any new housing estates. Last summer (2025) Hullbridge, along with Rawreth and South Woodham Ferrars was plagued

with unpleasant smells originating from this sewage plant as a result of “cake” being transported temporarily from Southend whilst construction works were being undertaken at their plant. We simply cannot tolerate any increase in the burden on the Watery Lane Plant without SIGNIFICANT levels of investment.

Q.10. – Achieving High Quality Design.

Yes. Hullbridge Parish Council broadly agree with Policy SC6. We would principally draw your attention to the particular importance of Para.3 Design Principles. Most especially Paras.3(c), (e), (f), (g) and (h) and want to see vigorous enforcement of this Policy by RDC.

Q.11.- Building Heights.

Yes. Hullbridge Parish Council broadly agree with Policy SC7. Certainly, we would strongly concur with the feedback from the 2021 Spatial Options consultation as summarised in Para 5.2.27 of this Policy. Similarly, we would identify totally with the Key themes in Para 5.2.28. To this end we would urge RDC to ensure that all the criteria set out in this Policy are rigidly enforced and adhered to.

Q.12. – Foulness and MOD Shoeburyness.

Yes. Hullbridge Parish Council completely agree with Policy SC8. We whole heartedly support the proposals contained within Paras 1 to 4 inclusive of this Policy.

Q.13. – Community Facilities.

Yes. Hullbridge Parish Council broadly agree with Policy CL1. We would completely endorse the feedback responses to the 2021 Spatial Options Consultation contained within Para 5.3.3. Our community facilities are all at full capacity already and certainly are in need of expansion eg Riverside Medical Centre; replacement eg the much-promised MUGA or newly created provision eg additional opening hours for the Public Library. Residents currently have to travel outside the village to be able to access most cultural, leisure and/or sports facilities; thereby generating all the negative aspects associated with such travel. Consequently, we would hope that RDC affirms its recognition of the significant value of community facilities to existing residents and that it will apply this Policy vigorously.

Q.14. Education Facilities.

No. Sadly, there is little here to agree with. Schools appear to be added only when there is one large (huge) development and there is no significant change if several ‘smaller’ developments are implemented. I’m not sure how this can tie into the current 10 year plan. This leads to longer journeys for all children which cannot be good for the children or the environment. Equally, whilst we see many areas proposed for testing, there is an implicit sense that these are being considered for housing - there is no identification of sites which may be suitable for education purposes. In Hullbridge for example, we already have a ‘new’ development of around 550 houses. These children are now attending the existing primary schools and local nurseries. There are (under consideration for development) an additional four ‘local sites’. None of these would be large enough to trigger the building of a new school. This would then require the expansion of the local school, which in turn might become so large that it loses its local feel to the children. Additionally, the children from those “new” developments would need to travel to get there increasing the dependence on cars and road infrastructure.

You equally express concerns around post 16 provision and particularly SEND provision but there is no further mention of how these will be improved other than travelling out of area. Perhaps one of the sites identified should be a school rather than ever more housing?

Our children will increasingly become unable to feel close to home even when they start school. School should be a gradual expansion of the child's emotional and educational journey but we fear that we risk wrenching them into the next part of their life journey far too soon!

With regards to Para 1 of this Policy, we feel that it should be amended to read "Proposals for new education facilities, including works to expand the capacity or offer of existing facilities, will be supported AND these measures MUST be in place before completion of the first phase of any housing development.

With regards to Para 2 of this Policy, we feel the term "locality" needs to be tighter. In our view locality should be interpreted as meaning no more than 5Km (c.3 miles).

With regards to Para 3 of this policy, we feel that the wording "...or appropriate financial contributions..." Should be replaced with ... adequate financial contributions..." to ensure that realistic contributions from developers are received.

With regards to Para 4 of this Policy, we would endorse totally, that facilities need to be much more readily available for community use than they often are currently and we would like to see that this is always a condition of any planning applications granted.

Q.15. Delivering Strategic Transport Infrastructure.

Yes, as an aspiration. is a very positive expectation. HOWEVER, we find this entire Policy to be aspirational and unrealistic. Only in fair weather and at weekends do you see any significant number of bicycles on the roads and there is very little evidence that planned cycle paths would improve this situation. It is far more likely that cars will be used for the school run (especially as schools are much further away from housing if the planned new developments take place).

Equally this is highly unlikely to be a chosen form of transport for getting to work. There is no detail about how and when public transport is likely to improve or increase and without this detail it is hard to imagine a journey into London, for example by public transport, is going to be chosen over taking the car to Rayleigh Station at least.

The issue is that too many houses are being forced onto one small area which is already struggling to cope.

Q.16. Mitigating the Transport Impacts of Development.

No. We can see and hear throughout the document that you are trying to support the local area through arguments relating to actual predictions rather than the government's 'standard measure' and we are grateful for that. However, we also realise that you have to follow government guidelines and we think this notion from the government is at the very best unrealistic. Life is busy for all and it is entirely unrealistic to think that the majority of people will be using public transport to get to work or equally to cycle or walk. This is just a way for them (the government and builders) to build without making sufficient improvements to the road networks.

We absolutely support the idea of developing local networks to allow and enable people to walk and cycle BUT the vast majority of people will use a car to get to work at least. These local networks will not impact in any significant way on the situation with ever increasing traffic problems if these developments go ahead. The developers MUST be made to pay for (wherever possible) the improvements and maintenance required to local roads especially but also to contribute to transport systems within the wider area but also to develop the infrastructure within and around the developments prior to building the actual dwellings.

Q.17. Active Travel Improvements.

No. This is again a very positive aspiration but there has to be concern that as human beings there will be far more cars used for many of these journeys when the weather is bad or people are in a rush especially. Whilst these things must all be planned and implemented and will make our world and local environments a better place, reality must also be considered and this has the potential to create more problems if people do not use these new approaches to movement.

Q.18. Passenger Transport.

Yes. A better public transport system will hopefully help to alleviate many current and future problems. In Hullbridge we have a high proportion of older residents and we also have a high proportion of people living in residential mobile home parks; most of which are on the edges of the village. There are no public transport routes to these parks and the older residents particularly might find reaching bus stops too difficult. Whilst they have access to Wyvern transport this is at a higher cost for those residents. Perhaps smaller local buses could be considered to reach these outlying rural areas?

Q.19. Parking and Electric Vehicle Infrastructure.

Yes. However, it seems that much of this section is hugely reliant on changes in human nature to ensure best outcomes.

Q.20. Employment Growth.

Yes. Hullbridge Parish Council support Policy EC1 in broad terms. We would fully support Para 1a and Para 2. In Para 2 we would specifically highlight Para 2b, in which it states that “any future large-scale housing development in Hullbridge will be expected to provide employment space, reflecting that this is a large village which has seen significant growth, yet which has little in the way of employment/commercial uses currently.”. We would also support the stated aims in Para 3a, which highlight Lubards Lodge Farm as a potential employment site. We feel that the site lends itself more to this form of development, if any development at all, rather than residential.

Q.21. Protecting Employment Land.

Yes. Hullbridge Parish Council support Policy EC2 with one proviso. Namely that we would not support proposals that see Warehouse/Storage/Distribution facilities as these would adversely affect not just the visual amenity enjoyed by residents but because of the adverse impact these activities would have on visual character, local road infrastructure, air quality, noise and residents’ general health and wellbeing.

Q.22. Home Businesses and New Ways of Working.

Yes. Hullbridge Parish Council would fully support Policy EC3, without further comment.

Q.23. Communications & Digital Infrastructure.

Yes. Hullbridge Parish Council would fully support Policy EC4. We would merely highlight the specific importance of Para 7 of this Policy and would hope that RDC would ensure that this para in particular is enforced most vigorously.

Q.24. Tourism.

Yes. Hullbridge Parish Council would fully support Policy EC5, without further comment.

Q.25. Employment & Skills.

Yes. Hullbridge Parish Council would fully support Policy EC6. We would merely draw a particular emphasis on Para 3 in its entirety.

Q.26. Southend Airport.

Yes. Hullbridge Parish Council would fully support Policy EC7, without further comment.

Q.27. Future Retail and Leisure Needs.

Yes. However, whilst we understand that there is debate regarding the benefits for town centres of building on the outskirts/edges of towns, it would most definitely benefit the green belt in many cases and feel that this should be considered whenever possible.

Q.28. Retail Hierarchy and the Sequential Test.

Yes. The aim to maintain the special characteristics and unique heritage of each town centre and retail area is really positive.

Q.29. Development in Town, Village Centres and Neighbourhood Parades.

Yes. There seems to be good protection for town centres including several restrictions and tests prior to any change of use. It is beyond sad that the same levels of protection cannot be applied to residential areas (towns and villages) to ensure that their individual characteristics will be maintained. We will be living in sprawling residential areas with 'Vibrant Town Centres' at this rate.

Q.30. Night-Time Economy.

Yes. Strong plans to ensure support for the areas and intentions for on-going monitoring.

Q.31. Shops and Public Houses in Rural Areas.

Yes. Positive aspirations backed-up by security in the form of monitoring and support.

Q.32. Housing Mix.

Yes. Of particular interest is the notion of flexible and adaptable homes which can be 'future proofed' or adapted enabling residents to stay in the same home if wished. Equally the inclusion of bungalows allows for residents to move to one level accommodation should they wish. One concern is the term 'affordable homes'. We all know that these are not genuinely affordable to buyers who are early in the process or first time buyers. This should be stressed to enable the younger members of our communities to get their place on the buying ladder.

However, we also feel that Policy H1 should include the provision of social housing for rent to meet the need for affordable homes for local families who are unable to buy or rent in the private sector. For many people 'affordable housing' is not affordable at all.

Q.33. Affordable Housing.

Yes. In part. Very positive is the approach to distinguishing expectations between greenfield and brownfield which encourages the use of the sites. Equally, the range of housing options within this range is positive. Unfortunately, it does not negate the impact on our countryside from building on ANY of the greenbelt.

We also feel that Policy H2 should include provision for social housing and council housing for rent.

We would also recommend modifying Para 6a to read 'Any affordable housing provides a tenure split of 60% affordable rent in the form of social housing including council housing; 25% first homes and 15% intermediate housing unless an alternative split is agreed with the Council's Housing team.'

Q.34. Protecting Existing Housing Stock.

Yes. This needs to be considered, as recommended, on a case-by-case basis.

Q.35. Specialist Housing.

Yes. This is an area that needs highlighting to enable residents to stay within their familiar locality wherever possible.

Q.36. Gypsy and Traveller Accommodation.

Yes. The only concern we have is that it suggests from the responses to the previous consultation, that joint local authority working should be considered. As with all areas, this needs to be managed to ensure that no one area has a higher proportion allocated to than others and this may need to be clarified within the policy.

Q.37. Residential Annexes.

Yes, as long as the policy is acted upon in the area of scale and size of the annexe in relation to the host property.

Q.38. Houseboats.

Yes, there appears to be sufficient detail to ensure that these applications will not become detrimental to the environment.

Q.39. Conservation and Enhancement of Historic Environment.

YES. Hullbridge Parish Council would broadly agree with Policy HE1, we would have the following comments.

However, whilst the Rochford District Council recognises that the Parish's and Districts historic environment has been created through a process of change and that change is one element in managing it. Conservation needs to reconcile the preservation of the special architectural and historic interests of the Parish with the wider Parish's sustainability.

Development which is sympathetic to the historic environment should enhance the historic identity, character and distinctiveness of the Parish, whilst also contributing to its

sustainability as a place to live and work. Although Rochford District Council claim compliance, it is essential that it is upheld for the future.

Whilst it is appreciated that non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions because of their heritage interest but which do not meet the criteria for designated heritage assets such as 'local interest' buildings. Advice from Historic England should be sought.

Significant new builds are not acceptable and that Solar Farms, Electricity Pylons, Wind Generators etc. in or near will NOT in any way impact on conservation areas in question.

Q.40 – Protecting the Natural Environment.

YES. We would agree in general terms with Policy NE1 but with the provisos that:

Whilst it is appreciated that non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions because of their heritage interest but which do not meet the criteria for designated heritage assets such as 'local interest' buildings. Advice from Historic England should be sought. Significant building works, domestic or commercial, Wind Farms, Solar Sites, etc. are NOT approved in or near to the Conservation Area.

We would particularly agree with everything contained within the Summary of Consultation Feedback (11.1.3). If we were to have any concerns it would be around the ability of RDC to vigorously enforce this and other Policies.

Hullbridge Parish Council and in principal Rochford District Council claims to support the importance and value of the Green Belt in sustaining the separate identity of Hullbridge from its neighbouring villages and the Rayleigh Town. Multiple proposals for significant housing developments located between Hullbridge and Rayleigh Town Centre could ultimately join them together in a urban environment contrary to what the local plan claims.

Grade 1 and Grade 2 Listed Buildings are included also proximity of new builds does not compromise the view and outlook of a listed building.

Q.41. Essex Coast RAMS.

YES. Hullbridge Parish Council wholeheartedly support Policy NE2. Our only comments would be that Para 2 of this Policy be amended to read "Subject to Part A, financial contributions WILL be collected from residential development to support the RAMS,"

Q.42. Biodiversity and Ecology.

YES. We would strongly support Policy NE3. Firstly, we would wish to highlight the importance of Para 11.1.23 in setting out perfectly the position of not only Hullbridge Parish Council but of Hullbridge residents also. Consequently, we would want to see a pro-active and vigorous enforcement of this Policy.

We would request that RDC consider increasing the Biodiversity Net Gain figure mentioned from 10 to 15%, as the Environment Act seems to be somewhat deficient in this respect.

We would also suggest to RDC that Para 6 should read "....., compensation MUST be provided.

Q.43. Landscape Character.

YES. Hullbridge Parish Council broadly supports Policy NE4. We would though like to make the following comments:

We would strongly support Policy NE4. Firstly, we would wish to highlight the importance of Para 11.1.32 in setting out perfectly the position of not only Hullbridge Parish Council but of Hullbridge residents also. Consequently, we would want to see a pro-active and vigorous enforcement of this Policy.

Although Para 4 is clearly well intended, with the benefit of recent experiences, it is difficult to see how any developments of the size currently being proposed could possibly blend harmoniously in the manner described in Para 5 (a) to (f).

Q.44. Trees, Woodland and Hedgerows.

YES. Hullbridge Parish Council broadly supports Policy NE5. We would though like to make the following comments:

We would strongly support Policy NE5. Firstly, we would wish to highlight the importance of Para 11.1.41 in setting out perfectly the position of not only Hullbridge Parish Council but of Hullbridge residents also. Consequently, we would want to see a pro-active and vigorous enforcement of this Policy. Sadly, here in Hullbridge we have recent experience of developers negligently removing an ancient hedgerow. There does need to be regular inspections of developments by tree officers and or nature conservation officers to ensure protection to these valuable community/biodiversity assets.

We would like to see Para 5 of this Policy strengthened to read “Where the loss of trees is unavoidable, replacement with native species will be required or adequate compensation for the purchase and relocation of native species in the closes viable proximity MUST be provided.

We would like to see Para 8 strengthened by redrafting the following: “Planning obligations will be used to require the replanting of any trees and or hedgerows that do not survive beyond 5 years after the end of constructions.

Q.45. Wallasea Island.

YES. Hullbridge Parish Council wholeheartedly support Policy NE6 without further comment.

Q.46. Delivering Green and Blue Infrastructure.

YES. Hullbridge Parish Council broadly support Policy NE7. Whilst the requirements to be met are well set out within the Policy, Hullbridge Parish Council would look to see that RDC vigorously enforce this Policy on developers.

Q.47. Water Management.

Yes. Hullbridge Parish Council broadly supports Policy NE8. We would however, like to make the following comments:

Firstly, we would wish to highlight the importance of Paras 11.2.8 and 11.2.9 in setting out perfectly the position of not only Hullbridge Parish Council but of Hullbridge residents also. Consequently, we would want to see a pro-active and vigorous enforcement of this Policy.

When considering developments in Flood Zones 1, 2 and 3, recent severe “Global Warming” events experienced locally, any developments would require consideration of flood risk projections over the next 100 years. Not just 25 years.

Q.48. Sustainable Drainage.

Yes. Hullbridge Parish Council broadly support Policy NE9 but would wish to make the following comments.

We would like to see Para 4 of this Policy reworded to read “Development proposals MUST incorporate permeable surfaces as a priority and preferred surface.”

Q.49. Water Quality.

Yes. Hullbridge Parish Council would broadly support Policy NE10 but would wish to make the following comments.

Firstly, we would wish to highlight the importance of Paras 11.2.38 in setting out perfectly the position of not only Hullbridge Parish Council but of Hullbridge residents also. Consequently, we would want to see a pro-active and vigorous enforcement of this Policy.

We cannot emphasise enough that the local wastewater infrastructure here in Hullbridge is ominously close to Full Capacity, as confirmed recently by Anglian Water. ANY further developments in Hullbridge or the near locality would SIGNIFICANTLY affect the local Wastewater Infrastructure and would require momentous levels of investment to upgrade. Any such upgrades need to be in place before any developments proceed or at the very least in parallel.

Hullbridge Parish Council, have significant concerns in regard to existing levels of pollution of the River Crouch. Not insignificant amounts of pollution entering the river as a direct result of direct discharge by Anglian Water. ANY additional developments would only make this situation unimaginably worse.

Q.50. – Protecting and Enhancing Open Space.

Yes. Hullbridge Parish Council wholeheartedly agree with Policy NE11. It is imperative that we protect our existing recreation and outdoor sports facilities as well as parks, allotments and other civic spaces. Wherever possible we need to increase the number of such facilities and enhance existing ones. There has been too little investment in these facilities over recent times. It must be remembered that these facilities have benefits not only for community, recreation and health & wellbeing but also for the preservation of general biodiversity and, in some instances, the prevention of communities merging into a single urban sprawl.

We would want to see meticulous enforcement and not appeasement of Para 1(c) of this Policy

Q.51. Providing New Open Space.

Yes. Hullbridge Parish Council generally agree with Policy NE12 but need to emphasise the following: That it is imperative that any developments permitted, irrespective of size, MUST provide **good quality** open space and play-space for residents. There is deficit of general greenspace in the district currently, so this would provide opportunities for the amount and quality of greenspace to be enhanced.

Q.52. Local Green Space Designations.

Yes. Hullbridge Parish Council generally agree with Policy NE13. We would state though that it is crucial that we continue to protect our Local Green Space and MUST wherever possible enhanced. Their importance for health, wellbeing, recreation and biodiversity, as well as their cultural and visual value is immeasurable. Developmental infringement must only be due to

very exceptional circumstances and subjected to the most vigorous of examination. Any such loss must be compensated for significantly by an increase in new space that is greater than that loss.

Q.53. Playing Pitches and Built Leisure Facilities.

Yes. Essentially Hullbridge Parish Council are in agreement with Policy NE14. We certainly agree totally with the statements contained within Para. 11.3.26. Their value is immeasurable in terms of public health, well-being, local identity, education and economic vitality.

There is a lack of Leisure and Recreational Facilities of all types across Rochford District and there needs to be much more general investment into the existing provision. In Hullbridge we have had several attempts to have a 3G MUGA installed to meet local demand. Up to now any such plans have always been refused. This is a facility desperately needed for the benefit of residents of all ages and we hope that we will see a more sympathetic approach to any future applications going forward. Currently, residents of all ages, have to travel to places such as Clements Hall or even further afield, bringing with that all the negative impacts associated with travel.

We are especially concerned that School Recreational and Play-spaces are particularly vulnerable, as evidence from other parts of the country has shown. Spurious claims from developers that there is an over-provision of recreational space in a locality has seen vital recreational space lost to the community. We would urge RDC to take a robust and unwavering stance if dealing with such approaches from developers.

Q.54. Strategic Site Principles AND General Site Principles and Site-Specific Policy Themes.

Firstly, Hullbridge Parish Council find the Governments Building Targets for Rochford District totally unrealistic. It seems that a formula has been derived solely to meet the Governments demands. The Governments figures bare no relationship to reality nor do they take into consideration factors such as physical geographic constraints, topography, age demographics or simple ability of services, including the police, to keep pace with current demand.

Whilst these principles within the Policy appear sound, we have not seen these feeding through to the details within other related policies contained in the document. They are shown in the policy overviews but cannot be readily seen within the detail. This is a cause of significant concern. We find that we are returning time and again to concerns regarding sufficient infrastructure being provided either prior to housing development or at the very least alongside. Otherwise, as we all know, money runs out and the necessities are not provided.

We have concerns regarding SO2 1.d “avoid being wholly/mostly within flood zones 2 and 3 “. We know climate conditions are making flooding more probable and yet this possibility is still included?

We have particular concerns relating to how Policy SO2, Para 1(d) could be applied in the case of Hullbridge. There is little scope for improvements to the local road network due to local physical constraints and one can only envisage that significant financial investment would be required to overcome these obstacles.

Additionally, Hullbridge Parish Council consider that the Green Belt needs to be protected at all costs for the protection of flora and fauna, Green/Open Space and prevention of the creation of Urban Sprawl leading to the loss of community identities.

We have considerable concerns regarding the negative impacts of drastically decreased levels of air quality from significantly increased levels of transport movement. These impacts are not just impacts on local communities' health and well-being but also on local biodiversity. These impacts need to be seriously considered when sites currently selected for testing are reviewed.

For most people affordable housing is unaffordable! In Rochford according to Shelter only 2.7% of housing is affordable for a young couple with children. Private rents are extremely high with no security of tenure and landlords can still use section 21 evictions to further raise rents on properties. Former Council tenants given contractual guarantees of continued secure tenancy rights on transfer to the Crouch Valley Housing Association found that the councils contract with them was broken on their subsequent transfer to another housing association. The biggest of these housing associations Sanctuary is a very poor landlord with many properties poorly maintained and tenants' concerns ignored. The council needs to build new Council Houses to provide secure tenancies to the many people who cannot afford to buy a property.

Q.55. Sites Identified for Testing.

Hullbridge Parish Council have a number of comments to make regarding the sites identified for testing.

In a general sense, the sites identified in figures 6a and 6b, across the current Rochford District represent an unacceptable level of potential development. Whilst we cannot authoritatively comment on each site in other Parishes, we can comment in such a way on those that affect us directly, namely.

CFS 026(a) This site lies wholly within the Green Belt and whenever planning applications have been put forward in this vicinity RDC has vigorously refused such applications citing the negative impact on the Green Belt and on local flora and fauna. We feel that this site should continue to be considered part of the Green Belt and excluded from consideration for the reasons stated above.

CFS100 This is a site within the green belt used for many years as a vehicle breakers yard and as such is contaminated by oil and other chemicals. There is a green open space area adjacent, which has significant value to neighbouring roads. It is also an area which has links to WWI and WW2 air defences, which is much in the mind and affection of many of Hullbridge's more senior residents.

Lower Road at this point is very poor and access from this site would lead onto a dangerous kink in the road direction; thereby posing a significant safety risk to road users and pedestrians. Lower Road is already severely congested at most times of the day.

Hullbridge Parish Council feel strongly, that this site is not suitable for residential development. If it is to be developed at all, it is the one site selected for testing in our jurisdiction that would be best suited to commercial development. Hullbridge is in significant need of small business/industrial units to provide some much-needed local employment opportunities.

CFS105(a) Although this site spans Rayleigh and Hockley, It is close enough to Hullbridge to have potential negative impacts by virtue of its location relative to Hambro Hill. With access from this site leading onto Hambro Hill being a realistic possibility, this would detrimentally increase the burden on an already over-capacitated local road network encompassing Down Hall Road, Rawreth Roundabout, Rawreth Lane and Hullbridge Road.

CFS033 CFS190(a) This site would be accessed by a VERY inadequate road; namely Pooles Lane. The sole access is from Pooles Lane, a narrow road which is only of a single carriageway width near its junction with Ferry Road. Pooles Lane is often severely congested with traffic trying to proceed in opposite directions and a development of this scale would make the problem much worse. SIGNIFICANT road infrastructure improvements would be needed to make this site a viable prospect. With the sole access onto Pooles Lane being from Ferry Road, any incident or accident in Ferry Road would make it very difficult for emergency vehicles to respond to an emergency in this area. Construction traffic for this site would necessarily pass a primary school and two nurseries along Ferry Road, posing a significant risk to school children, parents etc.

The site also lies within the Flood Plain of then River Crouch and as a result of recent severe “Global Warming” events experienced locally any developments would require consideration of flood risk projections over the next 100 years. Not just 25 years.

We would have concerns over the loss of viable agricultural land currently lying within the Green Belt.

It would also present adverse impacts on biodiversity, air quality, neighbours, education and healthcare provision.

This site is not suitable for such a large development.

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CFS265(a) Long Lane is not a public highway but a by-way not suitable for vehicles. The land is close to the Brandy hole sea wall breach and in the future would be prone to sea water flooding and surface water flooding. Access to this site from Pooles lane would impose an unacceptable degree of congestion upon an already inadequate road. If access was made through Long Lane to Lower Road, vehicles would join the road at an inadequate junction opposite the Nevendon salvage yard (CFS100) that is currently used as a lorry park. Lower Road is an already over-used road as evidenced in the RDC Transport Assessment (Regulation 18) and is in generally poor condition due to this over-use. Any access to Lower Road here would pose a significant safety risk to road users and pedestrians.

We would have serious concerns over the adverse impacts on biodiversity, air quality, neighbours' amenity, education and healthcare provision; not to mention the loss of agricultural land.

CFS015, CFS149(b), CFS164(a) & CFS277(a) Although these sites straddle Rayleigh Town Council, Rawreth Parish Council and Hullbridge Parish Council's jurisdictions, they all lie within 0.75 km (1/2 mile) of each other. The combined total of housing numbers, should they all be developed, would be in excess of 1500 houses. The environmental and infrastructural impact of these developments would be devastating locally.

They will impact on the same road networks which are already overwhelmed at times (see Transport Assessment Regulation 18). Then add to those the development CFS222(b) Dollymans farm; these would if all agreed bring c2159 additional homes in the area. If each home had two cars that could equate to an additional 4318 cars using the already overcrowded Fairglen Interchange. The improvements to that particular roundabout have now been delayed to 2030 or 2035. We realise that our calculations for cars per home differ from yours but we feel ours are perhaps more realistic. This is highlighting only those specific developments and one interchange but does not include the impacts to other roads. Whilst we appreciate the laudable aims to increase walking etc, we all know that in a busy life, public transport is unlikely to meet the needs of most people and cars will be used.

Site 149(b) lies on an area prone to surface water flooding with Watery Lane/Beeches Road often inaccessible to vehicles due to flooding. The road is inadequate and not suitable as a means of accessing any of these sites. This land is also within the Crouch future flood plain and is not suitable for residential development.

On a smaller scale and within Hullbridge some of the proposed sites for further testing are bordering or accessed by unadopted roads or very small roads. These roads will be seriously damaged by construction vehicles and equally could not cope with the extra 'normal' traffic if these were to be access routes for any new developments. What plans would mitigate this damage and give recompense to residents who are responsible for the upkeep of these roads?

As one resident of Rawreth said to one of our councillors - " They are going to do all this (build all these houses) and change the area irreversibly, then go and leave us to live here"

CFS260 This proposal is supported by the current administration of Southend City Council and is in effect a means of solving their highway problems. If this is supported along with other large-scale developments in that area, the realistic fear held by Hullbridge residents (and others) is that the Southend administration will seek to resurrect and build the Southend Outer Bypass project from Bournes Green through Rochford and along the Crouch Valley to meet the A127 at the Fairglen Interchange. If these developments do take place, the bypass

would destroy the green belt in the Crouch Valley and create the conditions for further large-scale developments along its length causing even further congestion and destroying Rochford's identity as the green lungs of south East Essex.

CFS278 This proposal is supported by the current administration of Southend City Council and is in effect a means of solving their highway problems. If this is supported along with other large-scale developments in that area, the realistic fear held by Hullbridge (and other) residents, is that the Southend administration will seek to resurrect and build the Southend outer bypass from Bournes Green through Rochford and along the Crouch Valley to meet the A127 at the Fairglen Interchange. If these developments do take place, the bypass would destroy the green belt in the Crouch Valley and create the conditions for further large-scale developments along its length causing further congestion and destroying Rochford's identity as the green lungs of south East Essex.