



To

Planning Officer
Planning Department
Rochford District Council
South Street
Rochford SS4 1BW

From

Brian Marsden-Carleton
Chairman
Hullbridge Residents Association
20 High Elms Road
Hullbridge
Essex SS5 6HB

For the attention of Mr. Stranks

Email: [REDACTED]
Tel: [REDACTED]

05. 08. 19

Stakeholder: 29007. Community Representative: CP 15678E.

Dear Sir

Re: "Proposed Residential Development". Application 19/00584/OUT. For 120 homes on 190 Lower Road Hullbridge SS5 6BD (Nevendon Yard). Consultation on this application.

Please accept this letter in respect of your letter dated 17 July 2019 requesting 'Comments' on the above mentioned proposed development, on behalf of the **Hullbridge Community Adult population of 6307** (extrapolated from mid-2009 census) – demographic = 0 to 16 = 1193, 17 to 64 = 4504, 65 to 85+ 1803. Please take this into consideration when producing your **Statement of Community Involvement (SCI)**, *having had the experience of scrutinising the SCI for the Malyons Lane site, which was flawed.*

The Community would have supported a less dense scheme for this site if the 500 dwellings on Malyons lane had not been granted approval. If these plans are given approval we wish to place on record that the following are the **'additional risks'** during construction work:

Unless proper assessments are carried out in relation to **"Flood"**, **"Drainage"** which must include **foul and surface water drainage**, connected to badly needed upgrading of neglected **existing drainage**, **"Contamination"** removal in the industrial area and the **"green belt"** area adjacent to the industrial area, which may have been overlooked, but it must be remembered that contamination, by its nature, will have spread outside the work areas. We are also advised that the **'green'** area may also have other deleterious material such as **'asbestos'**. We are aware the costs to be expended in the removal of this contamination. The **existing roads** are unadopted and the residents want to discuss the plans being put forward.

Road improvements

There does not seem to be any mention of **'road improvements'**, especially Watery lane, although not part of this scheme, this has a direct impact on the network which has not been considered. HRA must bring to your notice, as we did in our submissions for the Malyons Lane site in 2013/14, that the Government Inspector did advise Rochford District Council to consult with HRA on this subject but

the consultations never took place. We request RDC, in their 'wisdom', to resurrect consultation on the road network.

Population, Insurance & Housing association.

Our calculations suggest that the existing population of some 7,500 in 2018 is likely to expand by some 2000 on completion of the Malyons Lane site.

Should you give approval of this site you must take responsibility for the upheaval this will cause by construction traffic. We estimate that the village has some 14,000 vehicles at present, likely to expand to some 16,500. Common sense and Engineering sense dictates that the existing infrastructure is totally inadequate and that the normal cycle of 5 year 'upgrading' has been neglected since 1968.

HRA provided you with likely **Insurance** costs for the properties by Insurance Companies, to be at risk, and the costs to the householders are likely to be double the normal price.

HRA requested results of the assessments which were presumable were carried out for the Malyon Lane site, but this was never received.

The Planning Consultant for the above site invited the HRA Chairman to visit the Environment Consultants in Bristol and pending the final results we are satisfied that the Consultants are a reputable concern.

Purchasers Condition Reports for the developers of the Malyons Lane site indicated 79% of previously completed buildings required work to be completed, or in a poor condition, so when considering these prices paid, which are in many case too expensive, it is not satisfactory for the largest purchase of peoples' lives.

Recently the developers have been castigated for shoddy workmanship giving added costs to the purchasers for remedy and the builders doing their very best to be in denial. The problems the builders have are the lack of qualified sub-contractors, in turn is having a detrimental affect on workmanship, and the order of the day being the lack of supervision and Inspection by the Local Authorities handing over responsibility to the developers. Recently one of our MP's wrote an article about this very subject including the Housing Association in Partnership with the Local Authority, who offer an incentive to the Local Authority in return for approval of plans, and the cost differential between a private dwelling and the Social/ affordable Housing will be in the materials used, being cost effective to the developers.

Brownfield & Green Belt

The Nevendon Salvage site can be classified as "Brownfield land", but the adjacent 'agricultural land is still classed as "Green belt" and although this is put forward as a "Call for Sites" numbered **CF100** on the **New Local Plan** "call for sites", this was not shown on the **original Local Plan** in 2012. We expect RDC to seek 're-classification from the Secretary of State, and we can only guess that was the reason for the **Public Notice** in the Southend Standard dated 26 July 2019. We presume the forward planning regime seem to have overlooked this requirement. If this site is given approval it will be against the **NPPF** which states that open and 'undeveloped' character of the area must be protected. Thus we maintain that this development is '**Over development**'.

Overdevelopment

The original scheme offered 100 dwellings but is now 120 dwellings, making the density of 73 for the '**green belt**' area, only just acceptable in an area of 2.25ha (or a density of 33/ha) but the **Salvage** site suggests a density of 47 dwellings (54/ha) and is not acceptable, particularly that the dwellings may still have some residual contamination to contend with. The affordable housing number is 42 (35% of 120).

Mast hazard to health

Plot numbers 43- 48 are too close to an existing telecommunications mast at the rear of the 'yard', and does not accord with the "**Guide to Mobile Phone Masts**" which are endorsed by independent scientists and doctors, which constitute a **major Health Hazard**. Cancer clusters have been found around mobile phone masts up to 400 metres from a mast, which means that all the dwellings are affected. We are concerned for the community who may have to deal with additional insurance costs, and we hope this information will be recorded by the property Solicitors/vendors. Proof of this risk can be found in cases recorded in Devon, Lincolnshire and Staffordshire. Many doctors are now so concerned that they have signed petitions demanding the Government take this health risk seriously. It seems the haste to build to Government deadlines is causing future community risks. We regret to say that we had mentioned this about the Malyons Lane site but were told that the HSE and the Environment Agencies differ from the

Scientists and Doctors. HRA mark this as **Exhibit number One** and look forward to RDC providing adequate proof that these risks have been adequately researched and mitigating steps taken to deal with this issue.

Garden areas & Minimum standards.

Proposed flats 5-28 and 69-87 do not meet amenity space requirements and drying areas and some garden areas to houses do not comply with the **minimum standards** but is dependant on house types 2 bed or 3 to 4 beds. Some back to side distances may not be acceptable (**minimum distance should be 13m**). Plot numbers 53/54, 57/59, 68/69, 99/100, 103/104, and 105/106 contravenes the **45 degree angle rule** for overshadowing.

Car Parking areas.

Car parking in front of plots 39-42, 54-57, 88-90 and 100-103 goes against the **reduction of the visual impact** of on-site parked cars, as required by the **Essex Design Guide** and distances between dwellings for double car park spaces are not wide enough.

Access for Fire and refuse services considered inadequate.

The Fire Brigade and refuse services access is restricted to some plots in the central public open space, unless the surrounding 'shared surface' areas are constructed to **adoptable standards**.

It has been suggested that the Director of RDC prefers this site to be dominated as a traveller site, but we consider this is a political ploy to destabilise the 'community mind set' to accept housing.

Some Councillors suggest that this site should remain the same but the question of contamination remains a serious problem that will need serious consideration, to be dealt with for public health standard reasons.

Design Access statement

We also disagree with the statement made in the Design Access Statement that the salvage site has now an aggressive impact on the existing residential area including the hours of operation during evenings and weekends, especially on a Sunday. Since the industrial site has become a lorry breakers/park there has been less traffic movements than the original NSEC car breakers with their numerous car transporters using Lower Road daily.

Please also take into consideration the other 22 sites put forward for potential development in and around Hullbridge, if approved will cause a massive precedent for other sites in the District for the future local plan.

Village Status lost

Please take into consideration the other 22 sites put forward for development in and around Hullbridge, if approved will cause massive disruption and human stress, which becomes a precedent for other sites in the District shown in the Future Local Plan. This is a major cause for concern that all the authorities are not taking into consideration, the clauses in the LDF and the NPPF clearly state that 'over development' must be avoided at all cost.

As our previous correspondence to RDC, Hullbridge will lose its 'village' status within 5 years of the present approved development and our calculations, as submitted to you recently is that another 2700 potential dwellings will expand this population to **26,000**. Having spoken to some Councillors they emphasise that this scale of development will not happen, but judging by our experience over the last 7/8 years, we have no faith that the RDC are prepared to '**Listen**' to those who they profess to serve (community), despite the Government advice given to all LA that consultation '**inclusiveness**' is imperative since the Grenfell tragedy, where LA were found to be lacking in proper consultation, but we are concerned that the RDC will ignore all these objectives advised to them, which makes this time and effort taken to make these comments on plans rather fruitless. We both seem to have a different interpretation to the word "Consultation".

Meet with Landmark

We have met with Landmark Town Planning Group and understand the proposals put forward to RDC. HRA have had cordial and constructive consultations with the Planning Consultant, and suggestions made with regard to the layout of the development were accepted and incorporated within the scheme.

Following the public exhibition, with HRA in attendance, we drew up an action plan with Mr Beatwell with the main points of concern to the residents of Hullbridge, which centred on the "Highway Network", "Contamination", "Drainage", "Flood", "Congestion" and Environment. HRA understand that further reports and surveys have been conducted in line with the action plan. Although aware that this was at draft report stage, the final findings need to be reviewed in full by HRA.

Extension of time and Boundary line

HRA had applied for an extension of time to examine this very comprehensive planning application but Mr. Stranks failed to reply, but it seems regardless of the Government advising the LA to be more inclusive and responsive the RDC refuse to consult with our professional arm of Surveyors and Architect and administrative team who have helped compile the extensive documentation submitted which we know has been of much assistance in the deliberation of the Malyons Lane site, and having learned much from the experience of Malyons Lane it has not made any difference to Consultation between RDC, Parish Council and HRA, where this has not taken place. HRA submissions on the "**Boundary Line**" being a prime example, where the Parish Council gave the impression that they were the first to submit correspondence to conduct a review of the boundary line between Rawreth and Hullbridge Parishes, where about 30% of the dwellings being constructed are within the Rawreth Parish. HRA had submitted this information in a 45 page and 34 page document in 2014 along with copies of our correspondence between us and the Boundary Commission. We fail to understand why both the RDC and ther HPC continue to state that they are consulting the community as directed by the Constitution Guiding principles which is obviously not the case.

The Hullbridge Community requested we select some personal comments/objections to be added to what HRA have said on the Communities behalf.

Rowland King, Green Belt

The plot in question is classified as Metropolitan Green belt and Government guidelines state that building consent should only be given under exceptional circumstances. In this instance that criteria does not appear to have been provided in the planning submission. Currently there are no provisions in the local plan for this area to be redefined and government guidelines say that greenbelt should be protected to prevent 'urban sprawl'. Additionally, anyone living in Central Avenue have had recent plans rejected to extend properties by going upwards as the council stated this was not in keeping with the majority of properties in that road which is predominantly bungalows. So exception should not be granted to the developer. The developer has done some preliminary research on transportation and traffic in the area however:- Bus Routes- Reference is made to regular bus routes that run past the proposed development. There is only one service that runs once a week. The regular run number 20 does not go past the proposed plot but the nearest stop is about half a mile away on a steep incline for pedestrians on a very uneven pathway. - The information also states that the route is suitable for cyclists. Although Lower Road is used by cyclists predominantly at weekends but during rush traffic these routes are high risk to cyclists. Traffic and accidents- Research has been undertaken on the impact to traffic and historical accidents and states low use by HGVs during the 'rush' hour. However, Lower Road is a narrow road and HGVs are unable to keep to their lanes when traveling at the speed limit and above resulting in oncoming vehicles having to take evasive action and drive with their near side wheels in the unmade adjacent road and pathways. I would recommend that the data is double checked and repeated when the Maylons Farm and Rawreth Lane road developments are completed as the increased traffic from these developments does not appear to have been considered adequately. The road changes were to address those developments and not additional traffic generated by this proposal. The council should also consider the disruption any further road modifications taken while developing the proposed site. Emotions with the residents of Hullbridge are running high especially with the closure of Watery Lane for potential 10 weeks. This can be evidenced by viewing social media.- Increased traffic will undoubtedly result in increased air pollution which the Government are trying to reduce. Does the proposed development include charging points for electric vehicles or any other measures to improve air quality? Parking: Additionally, the report suggests that the development will provide parking in line with council planning recommendations. At their consultation meeting earlier this year the developer stated that overflow vehicles from residents and visitors caused by the development could park in adjacent roads, the majority of which are single lane unadopted roads where parking is already an issue. Due to the rural location and lack of public transport and high risk cycle routes which will undoubtedly result in more vehicles than

The Hullbridge Community requested we select some personal comments/objections (cont)

Rowland (cont) anticipated by the developer. These unadopted roads are maintained by residents and not suitable for additional heavy use. Schools and Doctors: Local schools and doctors are already at high utilisation so this proposal along with the Maylons Farm site will probably exceed capacity in the very near future. According to social media other local developments in the area are already experiencing issues in finding places in schools and being accepted at Doctors Surgeries. The proposed access road is used by farm and stable traffic. The development does not appear to allow for rigid HGVs horse boxes that can not use Central Avenue (maintained by residents) due to tight turn off Lower Road. Surface water and foul drains: Lastly the proposed development indicates that surface water drainage will be integrated with the existing storm drainage. As surrounding unadopted roads do not have storm drains and Lower Road easily floods during heavy rain this may create additional flooding in particular to the residents of Central Avenue. The field acts as a soak away for Central Avenue which currently is marginal as the land owner planted trees in the drainage ditch many years ago. So developing the area will increase the risk of pluvial flooding to Central Avenue and Lower Road due to increased surface water having nowhere to go. In summary, this proposed development in this location for reasons stated above is not suitable and in addition this is a very quiet semi rural area and will negatively impinge on the privacy of the residents of Central Avenue and other adjacent roads.

Jo Copping – Objection to Noise and traffic

I object to the OPA of 190 Lower Road and land between Central Avenue and Burlington Gardens.

As I am the only property on this side of Central Avenue I will be surrounded by housing estate. I have lived here for 45 years with no one else to bother me and suddenly I will be surrounded by a housing estate, cars, kids which I have no problem with, but is it going to encourage drug dealers which we have already in the village and yobs that will hang out.

Road to be straightened. Noise of traffic bad enough already some lorries can't get round the central road bollard they have to go on the wrong side of the road to straighten it out to get round not that it's used by walkers as in wrong place for pavement no pavement there.

Lost privacy. I will be overlooked and it will change the environment no end. Hullbridge is already over developed expect we will come under Wickford if it's keeps on.

Narrow road. We don't want any foot paths up this end for lots of people to use and no access for vehicles either, bad enough as it is without any extra, especially as we had to pay to get the road surfaced as you didn't want to know at the time. Also we don't need the extra litter that will come with all this we keep this road very clean and all do our own bit to keep it that way.

Jane and Steve Gaunt

Loss of rural aspect, too many flats, object to the public footpaths.

We moved here 46 years ago for its rural aspect, and now we are being told that we are going to be living on a housing estate, which means, with the present expansion of Hullbridge, it will become **over developed** with inadequate infrastructure i.e. Roads and Amenities with noise and air pollution becoming prevalent.

With regards to the proposed plans we feel that the percentage of flats is too high and should be reduced considerably. We also object to the two public footpaths. There should be no access either to or from the proposed development into Central Avenue (dog fouling, cyclists, children congregating i.e. noise, litter and antisocial behaviour) Central Avenue is an unadopted road and is maintained at the expense of the residents.

With our thanks for your co-operation in this matter

Sue King

This land is designated as Green Belt and is not included in the local authority current plan of possible sites suitable for a change of use. The government guideline states that Green belt should not be developed other than in "Exceptional Circumstances". The housing white paper goes on to say, "Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified requirements." The document goes on to say "unmet" housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development on a site within the Green Belt. In my opinion the proposed development of this site does not fulfil the exceptional circumstances clause I the guide lines that define Green Belt.

The Hullbridge Community requested we select some personal comments/objections (cont)

Sue King (cont)

Paragraph 79 of the NPPF states. "The government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence."

Hullbridge is a village and is served by a single regular bus service for residents to access the surrounding areas. There are few opportunities for employment within the village. Other public transport facilities sited in the application do not operate on a regular daily basis to allow access to work or education establishments. The cycle route referred to only runs part of Hullbridge Road, to access it from this site requires following a dangerous route along Lower Road which is the only through road for domestic, agricultural and commercial traffic.

The planned use of Burlington Gardens as the access portal to this development does not take into account the large vehicles that need to access the equestrian properties located in Burlington Gardens, Third Avenue and Central Avenue. Central Avenue is not a viable alternative due to the very tight turn onto Lower Road from Central Avenue.

The statistics provided by the developer do not take into account of current developments ongoing at Malyons Farm or on Rawreth Lane. Their estimates for additional traffic and its detrimental effects to air quality cannot be assessed until these developments are completed and utilised.

No additional infrastructure to the Hullbridge community is included and I can find no record of any funding planned or promised from Essex County Council, Essex Education, or local NHS to provide any additional facilities to accommodate increased population.

The application states that they will utilise existing drainage for ground water, (rain water run off). There is no such drainage in the surrounding streets. Both Burlington Gardens and the more populated Central Avenue rely on excess water draining onto surrounding fields. This is why following even light rain there is temporary flooding to Lower Road and to properties in Central Avenue.

The drainage ditch surrounding the field between Burlington Garden and Central Avenue was planted many years ago with hedgerow which is now well established. This provides habitat for various creatures and birds.

Jim – Local Plan: It might be on the Call for Sites listing for the 'New' Local Plan but that is yet to run it's course and be Chosen/ Allocated / Approved. The site in question is numbered CFS100 on the RDC **New Local Plan 2018- Issues and options Document**, which has the said application set against it and it was not 'allocated' within the current Local Plan as a "preferred option". Perhaps it is a convenient way to reject sites RDC do not support. These (and any other 'sites across Rochford, should be investigated if the intention is an appeal. Why didn't Mr. Stranks mention this at the Big meeting we had with RDC in February (before the exhibition). Why wait until now to utter this! The site "Contamination" issue will be very costly, especially that the developer will have to plan for assessments etc on the 'green-field' section also. The fear is that if this work is too costly for the developer, then they will have to go cap-in-hand to RDC, who are likely have consultation with the developer, Government and Housing Association.. However, it is just another load on the already overloaded systems (Roads / GP's / Pollution / Law & Order etc.

Mary

To whom it may concern, we Object the above and to the submerging developments that are being irresponsibly thrown at Hullbridge .

We have had to ignore the irritating Malyons Farm mayhem and constant u turns by the Developers, adjusting their unsuitable plans.

We now hear there are at least 4 more potential areas, in this cul de sac of a village, under the radar of Planners.

Malyons has not even started building and Nevendon Salvage Yard, Burlington Avenue (19/00584/OUT) is totally untouchable, until a proper survey of the contamination from it's present use and an (as yet) unacknowledged site of a rumoured village pond/dump is researched.

The Hullbridge Community requested we select some personal comments/objections (cont)

Mary (cont)

Being woken by a brilliant light shining across the whole of the upper storey of our home, at 3 a.m. as wide load, cabin home passes to be added to a new site in Pooles Lane and our opposite neighbour having his gutter, telephone line and soffits ripped off his house front by another passing wide load of exactly the same, is extremely upsetting and dangerous, but it's all being done right now at the same time in Ferry Road, and around Hullbridge . .

Please listen to our Residents Association, who have qualified representatives to speak for us. R.D.C. says on all documents- how it longs to help us all have a good quality of life and cycle, walk and breath.

Well that requires safe places to do so.

Many of us have worked for Essex Council and other such organisations, and have set up homes here in a small, one main road village , we know progress must come but 7 sites for potentially building housing estates is just going to make everyone's life impossible . Everyone including those who travel through Lower Road, Watery Lane to other towns and each time there is a traffic problem or accident, it will be on R.D.C decisions alone. It is not a game of Monopoly.

Public Notice in Southend Standard

HRA understand that there is no need for a change with the plans or indeed the accompanying documentation

As an aside the government issued new guidance that development plans older than 5 years were out of date notwithstanding which RDC have never updated their development plan in accordance with the updates issued under the NPPF.

And as such the planning application is construed to be a policy **complaint**, as it seeks development on previously developed land which is in accordance with the **framework** and indeed DM10 of the development plan and as the planning application is a departure for the development plan, it has to be advertised and if approved by RDC, will go to the Secretary of State for sign off. HRA hope that further consultation will be in order with the community. Perhaps the RDC will choose to ignore consulting with the community as before making sure that the odds are stacked against the community as usual.

Mary. Closure of Watery Lane

IF the traffic did indeed block off the access during the last attempt to make a "Silk purse out of a sow's ear!!" with Watery Lane -then duh!! Why on earth not learn from THEIR obvious mistake of mismanaging the signage and such and get the exit made clearly accessible-it is not rocket science- all those who have ever driven on to a ferry or ship have had the same situation -movement of traffic into slim lanes needs thought and man power (OH no that means paying up!) Filtering the flow and manning this and the entrance and exit .

They have just admitted they can't cope with actual on the ground problems, only on the plans- as mostly an automatic planning programme with tweaks??

It's totally lazy and money saving for them and boring and time consuming for us. The basic idea is like the sweet factory where you bung all the ingredients for dolly mix in- then open channels to filter them into the bottle as fairly as you can. Pay a person with a Stop/Go lollipop at each end -job done? This being done during school holidays-so everyone else doesn't matter? Folk going to Battlesbridge Church ? Antiques Centre /Chelmsford? Regular cyclists etc etc How do postmen feel ? Plus the other route has also got more construction going on! I followed a huge hay lorry through Lower Road to the development corner -interesting?

It is a post-plan panic -why was it not brought up at any meeting to be discussed with those road users that pay for the use of the roads? Didn't plan a deep ditch etc? IF the 3 way traffic lights were dangerous- can we have the incidents reference numbers , did anyone hear about it in Hullbridge in the nearby homes? Also- why not then stagger the traffic further along the road, instead of right on the corner – as I previously said, anyone boarding a car ferry knows how it works and that is on to a blooming boat!!! The response to the Salvage Yard = quick date during the Summer Holidays -ummm ????

BDW reply to watery lane.

The Watery Lane closure is largely required to ensure a better and safer flow of traffic as per discussions and agreement with Essex Highways. Previous utility diversion works were carried out under two-way traffic lights without the closure of Watery Lane which proved problematic when road users blocked the ability to gain access

which in turn led to more stress on the road network and added to queuing vehicles out of sequence with traffic management. The extent of our works to Watery Lane is to tie in the new Lower Road alignment and complete drainage outfalls. There are no unnecessary excavation works planned. Our contact at ECC is Mark Lawrence, Strategic Development Engineer [REDACTED] who I've always found most helpful.

Jacky Hampstead: 5 The Pories, which is directly impacted by the development works off Lower Road. Noise and smell from development.

Presently the contractors are moving via bulldozers and other heavy kit, the mounds of earth previously moved to the site adjacent to our garden.

I assume it all needs to be done to ready the site for the actual dwellings development but in the meantime the noise, the smell, influx of flies and general disruption is causing a great deal of stress to myself and my husband.

At the moment it is impossible to open the windows (as above) or indeed to sit in the garden or even to hang washing out to dry during their working hours.(which incidentally incorporated a 5.30 pm finish on Tuesday 9th July).

Carol Hughes Roads & Watery Lane.

We will complain to ECC (Highways).

I am so frustrated, are they so incompetent, or is it the lack of consideration for us residents, who have to try and live with the current situation.

Road works Ferry Rd, Lane closure Lower Rd, Watery Lane closed, diversion down Raweth Lane, which also has lane closure for 11 weeks. Today another 40 min journey to Battlesbridge at 10.30am.

It is currently impossible to get to any appointment, work or family commitment.

Karen Kelsall Watery Lane.

Travel and duration of works to 9 September, confused no of weeks..

It is indeed better to travel to work in the morning now all Schools have broken up but the evening is still as bad. Of course the lights being out at the end of Rawreth Road on Friday really didn't help at all and resulted in a bad accident first thing in the morning. What I would like to know is how long Watery Lane is actually going to be shut. In the Councillors email it was stated until the 9th September which is 6 weeks but on the board at the end of the lane it states 10 and of course there has been the mention of 12 weeks? The thought of having this for all that time is quite depressing. The comment of the road users blocking the ability to gain access. Yes there are some idiots that block it but it certainly wasn't all the time and surely they could do something about that!