

Application Ref	25/00539/OUT	
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Reocode	NATURE - Areas of Nature DRAIN - Insufficient drainage TREES - Loss of trees and vegetation OVERDE - Over development POLICY - Policy objection WILDLI - Protection of Wildlife HIGHWA - Traffic generation/access OTHER - null	Contact address 18 Etheldore Avenue Hockley Essex
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Id	16858	Timestamp 2025-08-21 13:59:33.065+01

Comment

Formal Objection to Proposed Development ÔÇô Mount Bovers

I am writing to formally object to the above planning application for the construction of hundreds of dwellings on land at Mount Bovers, Essex, currently designated as part of the Metropolitan Green Belt.

This objection draws on the National Planning Policy Framework (NPPF, December 2024), the Environment Act 2021, the Essex and Suffolk Water Water Resources Management Plan 2024 (WRMP24), the Agricultural Land Classification system, plus relevant environmental and infrastructure considerations, and the supporting and supplementary documents submitted by the developer.

1. Conflict with National Green Belt Policy

Under the NPPF (paras 147ÔÇô153), Green Belt land should be protected from inappropriate development except in very special circumstances, which must be clearly demonstrated. Paragraph 147 specifically directs that local planning authorities should prioritise the re-use of suitable previously developed land (brownfield sites) before considering development on the Green Belt. No compelling evidence has been provided that brownfield alternatives in the district have been fully explored and exhausted.

Paragraphs 153 and 154 confirm that the construction of new buildings in the Green Belt is generally inappropriate, except for limited categories that do not apply to this proposal. The scale of the schemeÔÇôhundreds of homesÔÇôwould represent substantial and irreversible encroachment into the countryside, permanently removing a significant area of Green Belt.

The proposal would also contribute to coalescence: the merging of previously separate settlements. Mount Bovers lies between Rochford and Hawkwell, with Hockley nearby. Development on this scale would visually and functionally join these settlements, eroding their

separate identities, contrary to NPPF para 142 leading to urban sprawl.

2. Absence of a Local Plan

Rochford District currently has no adopted Local Plan. Determining an application of this scale in the absence of an up-to-date spatial strategy is premature and risks prejudicing the proper planning of the area. The Local Plan process is the correct mechanism to weigh housing need against environmental constraints, infrastructure capacity, and Green Belt protection in a comprehensive, transparent way.

To proceed before such a plan is in place increases the risk of piecemeal, uncoordinated development that erodes Green Belt purposes, causes irreversible harm to the countryside, and fails to secure the necessary infrastructure and environmental safeguards to support sustainable communities.

3. Best and Most Versatile Agricultural Land

The site is understood to contain Grade 3a agricultural land (Best and Most Versatile (BMV)) under the Agricultural Land Classification.

NPPF paragraph 188 states that local planning authorities should take its economic and other benefits into account, giving preference to lower-quality land and that significant development of BMV land should be avoided. Loss of this high quality land would also conflict with national food security objectives and reduce the district's agricultural capacity, especially significant at a time when climate change and geopolitical instability are already putting pressure on domestic food production.

Given the absence of a current Local Plan, there is a risk that the site's BMV classification will not be properly weighed against alternative options. Independent verification of the Grade 3a classification should be commissioned before any determination is made.

4. Sustainable Development and Infrastructure Capacity

NPPF paras 15 and 16 set out that sustainable development must integrate economic, social, and environmental objectives. The proposed scheme fails this test:

Transport: The site is car-dependent. While there is an infrequent (and often unreliable) No. 8 bus service and potential for cycle use, these are not credible alternatives for the majority of residents. Especially given the current bus service frequency, reliability, and poor connectivity to key employment, healthcare, and retail destinations.

Healthcare: Local GP surgeries and dentists are already operating at or above capacity. No substantive evidence has been provided by the developer that the additional patient load can be absorbed without detriment to service provision.

Education: Local primary and secondary schools are close to or at capacity. No binding commitments or agreements are in place to secure sufficient school places.

Highways: The proposed access arrangements risk adding significant congestion to the local road network, with knock-on effects for road safety.

5. Water Supply and Wastewater

Essex and Suffolk Water's draft WRMP24 (Water Resources Management Plan 2025-2060) highlights serious constraints in water supply across the region. The developer's documentation confirms that potable water for this scheme would be supplied via the same network already under pressure, with no identified new source. WRMP24 emphasises demand management, leakage reduction, and the need to avoid developments that exacerbate supply deficits.

The wastewater strategy indicates treated discharge into local systems. Given the limited local treatment capacity, there is a legitimate concern supported by historical Environment Agency reporting that the area could face situations where residents are, in effect, re-consuming treated wastewater (toilet to tap). This poses significant public perception and potential public health issues.

6. Biodiversity Net Gain (BNG)

The Environment Act 2021 (Part 6, Sections 98-101) requires a minimum 10% Biodiversity Net Gain for new developments, to be maintained for at least 30 years. While the developer has submitted an outline BNG report, it contains insufficient detail to demonstrate:

- How baseline biodiversity was assessed (especially for hedgerows, watercourses, and protected species)

- The precise location, type, and management of habitat enhancements

- Long-term funding and management arrangements

Without this evidence, it is not possible to conclude that the scheme will deliver mandatory BNG, let alone that it will enhance rather than diminish local ecological networks, contrary to NPPF guidance.

7. Flood Risk and Surface Water Drainage

The site includes areas susceptible to surface water flooding. The proposed Sustainable Drainage Systems (SuDS) which are designed to mimic natural drainage and manage rainfall runoff close to where it falls lack full technical detail, particularly on long-term maintenance and adoption responsibilities. This raises compliance concerns under NPPF para 174 and the Flood and Water Management Act 2010.

8. Heritage Assets

Under NPPF paras 202-211, proposals affecting heritage assets whether designated or non-designated must be assessed for their impact on significance. The submitted Heritage Statement is incomplete in its assessment of indirect impacts on nearby listed buildings and the historic landscape setting. Development on this scale risks altering the rural character and historic context of the surrounding area, causing harm that is not outweighed by the scheme's public benefits.

Conclusion

The proposed development conflicts with key provisions of the NPPF, the Environment Act 2021, and Essex and Suffolk Water's WRMP24. It would cause significant and irreversible harm to the Green Belt, result in the loss of Best and Most Versatile agricultural land, strain already overburdened local infrastructure, and fail to demonstrate compliance with mandatory environmental safeguards.

For these reasons, I respectfully urge Rochford District Council to refuse this application.