R02 Land north of Hambro Hill, Rayleigh

We at Hambro Hill United Community Group would like to challenge some of the points in the Regulation 19 Plan

We note at the outset that the Regulation 19 documentation refers to this as the Hambro Hill/Hadley Road junction. We understand the junction in question to be Hambro Hill/Hockley Road. We would therefore ask the Council to confirm that this is the junction referred to in the Transport Assessment and correct the terminology if necessary.

Until this is clarified, we have assumed that all references to Hockley Road in this document refer to the junction identified by the Council as Hambro Hill/Hadley Road, on the basis that “Hadley Road” is a typographical error rather than a reference to a different junction or a different location within the modelling**.**

1. TRANSPORT

The interim Transport Assessment modelled **24 junctions across the whole district**.

The Council’s own evidence states that the majority become over-capacity on at least one arm when Local Plan growth is added. Seven have potential mitigation.

But three are specifically identified as **not being able to be mitigated because of their constrained nature**:

Hambro Hill/Hockley Road junction is one of those three.

If we also add that the proposed access point to the site itself is on the brow of a steep hill with a blind bend approx. 20 metres away on the north side of the junction.

The Council also says a further Transport Assessment is being prepared using the latest AIMSUN model, including 2026 baseline and future 2042 Local Plan development.

R02's required main vehicular access is **Hambro Hill** and the Council suggests the site is expected to adequately mitigate its impact on the road network.

So, our question to the council would be:

If the principal access to R02 is via Hambro Hill, how can the Council currently demonstrate that the allocation is sustainable and deliverable when its own

current transport assessment identifies the Hambro Hill/Hockley Road junction as a constrained junction incapable of mitigation?

Specifically:

- What physical improvement is proposed?
- Where exactly would it go?
- Is there sufficient land?
- Can it actually be constructed?
- What would it cost?
- Who pays?
- When would it be delivered?
- What happens if it cannot be delivered?
- What happens to the 175 homes if the junction remains constrained?

2. THE TRANSPORT EVIDENCE IS NOT FINISHED

The Council says the latest AIMSUN model is still being incorporated into a further version of the Transport Assessment.

It also adds that further technical work and clarification are continuing.

Most importantly, the report states the final Regulation 19 supporting assessments were **not yet available when the report was prepared**, and that they would be completed and published before the Regulation 19 consultation.

Our challenge to this would be:

Why is R02 being allocated now, when the transport evidence on which its deliverability depends is still being updated?

And also:

What happens if the completed modelling shows that the Hambro Hill access cannot satisfactorily accommodate the allocation?

The Council itself is saying:

1. the current modelling identifies a problem;
2. one of the relevant junctions cannot currently be mitigated;
3. a new AIMSUN model is still being incorporated;
4. further mitigation work is still being considered.

This raises a fundamental question about whether R02 has been allocated on a sufficiently complete evidential basis

3. “CONTRIBUTIONS” ARE NOT THE SAME AS INFRASTRUCTURE

The document says that developers will have to make financial contributions towards off-site highway improvements **“as may be reasonably required”**, with the level and timing to be determined through the planning obligation.

This wording is very similar to many other allocations throughout the whole Plan.

The problem isn't the existence of the contribution mechanism, we all know how that works.

The question is whether the Council knows **what R02 actually needs**.

The Council's own Policy MG4 states that **infrastructure should be delivered in step with development,** with trigger points aligned to build-out and occupation so that infrastructure is operational when needed.

It also says the IDP identifies indicative infrastructure priorities, costs and delivery mechanisms, although many projects require a mixture of developer contributions, public funding and partnership working.

We would like to ask:

What specific highway infrastructure is required to make R02 acceptable, what is its estimated cost, who is responsible for delivering it, and what is the occupation trigger?

And particularly:

If the required improvement cannot be delivered because the Hambro Hill/Hockley Road junction is physically constrained, what mechanism prevents the 175 homes from proceeding anyway?

4. R02 IS NOT A SMALL SITE

The Plan allocates **around 175 homes** to R02.

Its trajectory is:

- 69 homes — 2032/33
- 69 homes — 2033/34
- 37 homes — 2034/35

That's potentially **175 additional homes using the same local transport network**, concentrated over only three years, assuming that trajectory is adhered to.

We would like to ask:

Has the transport assessment tested R02 as part of the cumulative development coming forward around Rayleigh, rather than simply assessing the 175 homes in isolation? Bearing in mind the Council itself repeatedly talks about cumulative infrastructure impacts.

5. WALKING AND CYCLING — IS NOT A SUBSTITUTE FOR HIGHWAY CAPACITY

R02 requires good pedestrian and cycle connections to LCWIP routes or other relevant evidence, which is positive in principle but anyone who knows Hambro Hill will be fully aware that there is no way of adding a cycle lane due to the width of the highway and both pavements.

There's also an important distinction:

Even if you could provide a cycle route, that does not automatically remove the need to demonstrate that the highway network can accommodate the development.

So, our next question would be:

How much of the assumed reduction in car travel from R02 is dependent upon walking, cycling or public transport, and what specific walking and cycling infrastructure has been identified for R02, what is its delivery mechanism, and does it provide a realistic alternative to car travel?

And:

Are those improvements committed and funded, or merely objectives to be delivered later?

6. CRITICAL DRAINAGE AREA

The Council's own evidence identifies R02 lying within a **Critical Drainage Area,** this is a major issue.

According to the Water Management Policy NE7: All proposals must demonstrate that the development avoids or reduces risk from all sources of flooding, including fluvial, tidal, surface water, groundwater, flooding from sewers, the effects of climate change (including predicted future alterations). **Development will not be supported where it increases flood risk elsewhere.**

The allocation also specifically requires surface-water runoff to be minimised and mitigated in accordance with Policy NE8.

But according to the supporting text:

early consultation with the Lead Local Flood Authority will be required to determine the appropriate mitigation.

This site has a known drainage constraint, but this appears to leave the detailed mitigation solution to be established at a later stage.

Policy NE8 itself is quite demanding. It says development must not increase surface-water flood risk elsewhere and that runoff should be no greater than the pre-development rate, where technically achievable.

We have a few questions on this subject:

1. **What evidence currently demonstrates that 175 homes can be accommodated on R02 without increasing surface-water flood risk either on Hambro Hill, Hockley Road or elsewhere downstream?**
2. **What drainage infrastructure is required, what will it cost, and is its delivery secured before occupation?**
3. **If the necessary drainage solution cannot be achieved within the site, does the Council still consider the allocation deliverable?**

7. WATER SUPPLY AND WASTEWATER.

The Plan describes Rochford as an area of **serious water stress** and says the water supply and wastewater network will require significant upgrades.

The Water Cycle Study says future growth can be supported, **provided infrastructure upgrades, water efficiency and sustainable drainage measures are implemented**.

The Council's own evidence claims that most new developments are likely to require network reinforcement.

And its policy says housing needs to be appropriately phased so that network upgrades and extensions are delivered in a timely fashion.

The question specific to R02:

Has the Council established that sufficient water supply and wastewater capacity exists for R02 at the point its 175 homes are scheduled to be occupied?

And:

If network reinforcement is required, what is that reinforcement, who funds it, and when will it be operational? Particularly as the Council themselves state the principle of infrastructure being delivered alongside, rather than after, development.

8. HEALTHCARE CAPACITY

The Council itself acknowledges a problem here.

According to the report:

all existing GP practices are operating below recommended capacity standards and will require expanding to match growth.

It also says there are strong concerns about the cumulative effect of growth on healthcare and other infrastructure, and that infrastructure should be delivered in step with development rather than retrospectively.

Our question is:

What additional primary healthcare capacity has been identified as necessary as a result of the Local Plan, and how will that capacity be available when the additional population from R02 and all other proposed sites arrives?

And for R02 specifically:

What contribution will R02 make, what facility will that contribution fund, and when will that additional capacity actually become available?

9. EARLY YEARS / NURSERY PROVISION

The allocation requires approximately **0.11 hectares for an early-years and childcare nursery** which shows that the Council recognises the development creates infrastructure needs.

We would like to know:

Is the 0.11 hectare nursery land sufficient for the additional demand generated by R02, i.e. who came up with a figure of 0.11 hectares, and more importantly, <u>who will actually deliver the nursery</u>?

Also:

Is there a funded delivery mechanism and occupation trigger in place, or is the land simply to be provided?

Providing an allocated piece of land and delivering a functioning nursery are two very different things.

10. THE SITE'S DELIVERY DATE IS INTERESTING

The document states that R02 isn't expected to start until **2032/33**, with completion by 2034/35. The Council says its housing trajectory takes account of infrastructure dependencies, lead-in periods and delivery risks which are partly the reason why the trajectory is stepped.

But that creates our next questions:

Where and how did the council arrive at these expected dates when the full planning from the developers for R02 hasn't even been submitted yet?

And:

What infrastructure is expected to be delivered between now and 2032 to make the site acceptable, and has that infrastructure actually been committed to?

The Council's stepped housing trajectory exists partly because large developments take years to obtain permission, start construction and deliver infrastructure. This isn't predicated upon real life experience, once full planning permission has been granted a developer can start the day after, therefore these timescales have no basis in fact.

But the late delivery date alone is not proof enough that the problems will be solved.

11. THE HOUSING TRAJECTORY HAS VERY LITTLE SLACK

As we understand it, the Plan appears to contain:

- 1,136 existing commitments
- 750 windfall homes
- 9,925 new allocations
- total supply: 11,811

- requirement: 11,713
- surplus: only **98 homes**

That's only about **0.8% above the stated requirement**.

At the same time, the Council proposes a stepped trajectory of:

- 370 homes/year initially
- then **912 homes/year**

against the standard requirement of 689/year.

912 is approximately 32% higher than 689.

If several allocations prove slower or more difficult to deliver than anticipated, the Council has very little numerical headroom.

And the 750 windfall homes aren't even allocated specific identified sites.

We would like to know:

How sensitive is the housing trajectory to individual allocations failing to deliver, particularly where those sites depend on unresolved infrastructure constraints? And Has the Council tested this through sensitivity or contingency modelling?

More specifically to R02:

If R02 does not deliver its 175 homes in the projected 2032–2035 period, what alternative supply does the Council have?

12. THE COUNCIL'S OWN “INFRASTRUCTURE-LED” CLAIM

The spatial strategy says development is directed according to:

- sustainability;
- whether infrastructure can be provided;
- environmental impacts;
- landscape and character;
- transport;
- education;
- health;
- utilities;
- green and blue infrastructure.

And Policy MG4 says the Council needs **certainty that development won't proceed without appropriate infrastructure mitigation.**

We think it would be fair to say:

We are not opposed to infrastructure-led growth. We are merely asking the Council to demonstrate that R02 is actually infrastructure-led rather than infrastructure-dependent.

The 2 things are clearly not the same

13. THE “WE'LL SORT IT OUT AT PLANNING APPLICATION STAGE” ARGUMENT

From previous experience we expect the council may say something along the lines of:

“These matters will be dealt with when a planning application is submitted” and sometimes that is entirely legitimate.

But the Local Plan still needs to establish that the allocation itself is **suitable, justified and deliverable**.

The report itself acknowledges that material elements of the spatial strategy and allocations need adequate and proportionate evidence and that relevant constraints must be considered **cumulatively**.

Therefore:

If the Council doesn't yet know whether the principal access junction to the R02 site can be satisfactorily mitigated, how has it established that the site is suitable for allocation rather than merely potentially suitable subject to future investigation?

14. GREEN BELT / SETTLEMENT SEPARATION

The Council's report says the updated Green Belt assessment identified particularly fragile areas which help prevent settlements merging, including **Rayleigh and Hockley**.

It also explicitly warns that identifying land as grey belt does **not** automatically mean that it is suitable for development; environmental constraints and sustainable transport still have to be considered.

The Council need to examine the **actual R02 site assessment and Green Belt Review parcel assessment** first.

Therefore, when examining the site:

What was the R02 site's specific Green Belt contribution, and how was the site's subsequent Grey Belt status assessed, particularly in relation to separation between Rayleigh and Hockley?

15. ALTERNATIVE SITES

The Council claim to have assessed alternative growth strategies and site options, considering things including:

- environmental constraints;
- Green Belt;
- accessibility;
- transport;
- infrastructure;
- deliverability.

The final assessment of reasonable alternatives is supposed to appear in the Regulation 19 Integrated Impact Assessment.

We would like to establish:

Why R02 was preferred over other potential Rayleigh sites?

- Was it genuinely more sustainable?
- Was it easier to access? (Unlikely due to points already raised regarding the Hambro Hill/Hockley Road junction)
- Did it have fewer infrastructure constraints?
- Did other sites score better or worse on transport?
- How were the site's constraints weighed against its contribution to meeting the housing requirement?
- Were sites rejected because of constraints that R02 also possesses?

The last point concerns us most because If other sites were rejected because of highway constraints, how were those constraints assessed against the apparently similar constraints identified at R02?

16. THE “SUFFICIENT EVIDENTIAL BASIS” ARGUMENT

We understand that the Council aren't saying “Every issue has been resolved.” They explicitly acknowledge that further technical work and clarification are continuing.

So, our next question would be:

The Council has evidence, but does the evidence demonstrate that R02 is actually deliverable given the unresolved transport constraints at the Hambro Hill/Hockley Road junction as well as the poor access to the R02 site itself at the brow of the hill?

17. THE THREE-LEVEL R02 TEST

If we strip everything down, we come up with three main questions.

TEST 1 — Can you physically get the traffic in and out?

Potential problem:

Proposed access to the site itself is on the brow of a hill and on a blind bend approx. 20 metres to the North. The Hambro Hill/Hockley Road is identified as a constrained junction which the TA says cannot be mitigated.

TEST 2 — Can the infrastructure cope?

Potential problems:

- highways;
- drainage;
- water;
- wastewater;
- GP capacity;
- nursery provision.

TEST 3 — Has the Council demonstrated the solutions before allocating the site?

Potential problem:

Several pieces of important supporting evidence are still being completed or updated.

To Conclude:

Our concern is not simply the principle of housing development. It is whether the Council has demonstrated, on the evidence currently available, that R02 can accommodate approximately 175 homes and the infrastructure required to support them without unacceptable cumulative impacts.

We therefore ask the Council to demonstrate how the allocation is deliverable, particularly in relation to transport, infrastructure capacity and the unresolved constraints identified in its own evidence.

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