



HOUSE OF COMMONS  
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Sent via email to:  
Jonathan Stephenson and cc'd Corporate Services  
Hard copy to follow

PLEASE QUOTE ON CORRESPONDENCE

Our Ref: AJ/Stephenson/090921/MF10275

21 September 2021

Dear Mr Stephenson,

**Response to Rochford District Consultation on New Local Plan**

I am writing to you regarding the Rochford District Council (RDC) consultation on your emerging new Local Plan. Please regard this letter as my formal response to your consultation. I have set out my comments under what I hope are a number of relevant headings below. In the interests of transparency, I declare an interest as a local resident myself, having lived in Essex for half a century and now in Rayleigh for a little over twenty years.

General Points

We obviously need to build some new homes in the Rochford District over the next two decades, as we cannot expect people to live at home with their parents into their 50's. Nevertheless, the whole thrust of this letter is that there should be no further major housebuilding in the Rochford District without significant infrastructure investment first. Any new Local Plan has to be both environmentally and economically sustainable and must safeguard the interests of existing residents, as well as new ones.

Background

RDC has initiated this consultation, as part of the process of updating its Local Plan, an overall process which is likely to take around a further two years to complete. Once the draft plan, which should then cover the period out to 2040 has been formulated, this process should then include an examination in public by an Inspector from the Planning Inspectorate, at which I would like to request an opportunity to give evidence as one of the local MPs, when the time comes.





However, in the meantime, before RDC begins to finalise its new plan, the Council has sought early feedback from local residents, and I hope that as many as possible will have taken the Council up on its suggestion and provided comments of their own.

In my response, I have sought to make some important general points about the need to ensure that any future housebuilding is accompanied by the necessary expansion of local infrastructure. If that cannot be guaranteed, then I believe that major house building in the District should be resisted until it can.

### Geography

Much of the Rochford District is effectively contained in a peninsula, bounded by the Thames Estuary to the South (beyond the Borough of Castle Point); the North Sea to the East and the River Crouch to the North, which forms a border for much of its length with the neighbouring Maldon District.

As a result of this, there are only a limited number of major routes into and out of the District, which are a major consideration in formulating any new plan.

### Transport Corridors and Constraints

Rochford District is connected to the capital via a direct rail route into London Liverpool Street. This has been upgraded in recent years, with major investment in new overhead wires, longer trains with increased capacity and the upgrade of some platforms, plus a new station at Southend airport.

Prior to the Covid-19 pandemic, trains in the morning and evening rush hour were bursting to capacity. Passenger numbers are now recovering as we finally emerge from Lockdown but the extent to which capacity problems on the line will re-emerge will partly be determined by how working patterns alter post-pandemic and the extent to which people are permitted/desire to work from home, as opposed to a return to regularly commuting into London, in the traditional manner.

Rail capacity should be expanded further, when the much-delayed Crossrail (now named the Elizabeth Line) eventually opens across London, hopefully now no later than 2023. The Public Accounts Committee (PAC) on which I now sit, recently took evidence on Crossrail and is now likely to publish its latest report on the project, within the next few weeks.

In terms of air travel, unfortunately, due to the loss of traffic resulting from the pandemic, both EasyJet and Ryanair have recently withdrawn scheduled passenger services from Southend, leaving the airport largely dependent on freight traffic and aircraft maintenance work for its survival. Hopefully, regular passenger services, including to popular holiday destinations, might be resumed once the economy has fully recovered, although this is by no means guaranteed.





However, the major constraint in terms of transport links to and from the Rochford District is undoubtedly the road network, which in many cases is already seriously overstretched. The two main road arteries leading to/from the Rochford District are the A127 and the A13.

In spite of a number of junction improvements in recent years on the A13 and A127 and widening schemes on the A13, both of these major roads are already at or very close to full capacity at rush hour. An Essex County Council A127 Task Force meeting, held a little before the pandemic struck, examined the “heat maps” for both roads (i.e. the busier the road, the darker the shade of red on the map). These showed that in both the morning and evening rush hour, both roads glowed deep red, with both at between 98% to 100% capacity. As we have emerged from Lockdown (and indeed as many people have avoided public transport, because of the virus) traffic levels are now virtually back to pre-pandemic levels already.

Despite some limited opportunities for modal shift (both roads are highly unsuitable for cycle lanes, which would be subject to heavy traffic pollution anyway) there is a strong culture of private car use in South Essex, which many residents see as part of living in a free society. This seems unlikely to be altered by entreaties to simply abandon private car use, however well-intentioned (especially as some of those making such calls use their own private cars frequently as well).

DEFRA has been concerned for some time about air quality issues, especially along the A127 and has effectively compelled neighbouring Basildon Borough Council to implement a number of air quality initiatives, in order to obviate the imposition of a formal air quality zone in the Basildon/Pitsea area, close to the RDC boundary. Over the lifetime of the proposed new plan, this problem may be partially alleviated by the increasing introduction of electric vehicles but, while this may well deliver environmental benefits, it still does not solve the issue of the sheer volume of traffic already using both roads in the early 2020s, let alone by the late 2030s.

Along with some others, I have been calling for several years for a straightening out of the old Fortune of War junction on the A127 at Laindon (which itself would be likely to deliver air quality benefits, not least by avoiding the need for literally thousands of vehicles to slow down and then accelerate, in both directions, every day). Nevertheless, bureaucratic indifference from Essex County Council has meant that this idea is unfortunately little further advanced, despite its obvious benefits, including speeding up traffic flows on what is already one of the busiest A roads in the country.

In short, it is an “inconvenient truth” that these two major roads are already virtually maxed out at peak times and any further local house building plans clearly have to take this serious constraint very much into account.

Unless the Government is seriously prepared to finance a major upgrade of the A127, to a largely three-lane M127 standard, (which would likely require upwards of a billion pounds), then major house building in the Rochford District should be strongly constrained.





Our local roads are also extremely busy too. The B1013, which runs from Rayleigh, through Hockley and down into Hawkwell, is already one of the busiest B roads in the country, especially during the morning and evening peak. Also, the Ashingdon Road, leading from Ashingdon down through parts of Hawkwell into Rochford, is also a very busy road, as anyone who has used it regularly during the rush hour can testify. This is one of the reasons why I spoke out so forcibly at Rochford District Council's Development Committee against the recent Bloor Homes application to build 662 properties just off the Ashingdon Road, which I am pleased to say that RDC resolved to oppose (and which may now go to appeal as a result).

In any future plans for more housing in the Rochford District, a vital question will be, where will the accompanying new roads be built/expanded – and, crucially, who will pay for them? For all the reasons outlined above, it is important to raise this absolutely key issue now, before any new Local Plan is formulated.

#### Pressure on NHS Services

I declare a potential interest in raising the topic of pressure on NHS services, as my partner works as a Radiographer at an NHS hospital. Indeed, she has worked for the NHS for nearly two decades now. Nevertheless, this has helped to provide me with some additional insight into the pressure our hospitals and the wider NHS has been under, especially as a result of the Covid-19 pandemic.

Essex has five major District General Hospitals, arranged roughly in a star pattern, with Chelmsford (Broomfield) in the centre and the others in Harlow (North West); Colchester (North East); Basildon (South West) and Southend (South East). In 2020, Basildon, Broomfield and Southend came together to form the Mid Essex Hospitals NHS Trust. Even prior to the Covid-19 pandemic, all five hospitals were already under pressure and the pandemic has obviously exacerbated these problems further.

As far as I am aware, none of the forty hospitals earmarked for new construction and/or major rebuilds are currently earmarked for Essex and despite the best efforts of dedicated NHS staff, pressure on our hospitals in Essex and, in the case of RDC on Southend Hospital in particular, is only likely to be exacerbated by further major house building in South East Essex. NHS planners and the senior management of the Mid Essex Trust clearly need to take these additional pressures into account and a solution must be found or any major house building should be delayed until it is.

Access to primary care and GP appointments in particular is an increasing issue across the Rochford District as, again, the NHS seeks to rebalance in emerging from the pandemic. The reorganisation of Clinical Commissioning Groups (CCGs), which seek to co-ordinate primary care services and commission hospital care as well, from five CCGs to one across South Essex, is now being superseded by the creation of larger Integrated Care Systems (ICSs) which seek to more closely co-ordinate NHS and social care services.





A new Mid and South Essex ICS (which should mirror the area covered by Basildon, Broomfield and Southend Hospitals) is now scheduled to begin operating from April 2022 onwards. As well as these senior level reorganisations within our local NHS, any further expansion in the local population will need to be accompanied by a commensurate addition in the availability of primary care services, especially GPs. With the trend in recent years towards fewer but larger practices, there is a need to consider expanding the physical size of a number of practices (as, for instance, was achieved with the new extension to the Audley Mills practice in Rayleigh, several years ago). Similarly, just across the boundary in the Basildon Borough Council area, a major new surgery building was opened in Wickford town centre (also part of my Rayleigh and Wickford Constituency) just a few years ago.

However, the Riverside Surgery at Hullbridge secured planning permission several years ago to expand its first floor, to include extra consulting rooms and administration space, to cope with the expansion in the local population, including from the new Barratt David Wilson development of some 500 new homes at nearby Malyons Farm. Nevertheless, several years on, mainly due to internal NHS bureaucracy, the work has still not commenced, despite the fact that houses on the new development are already being occupied in some numbers.

This complicated and highly bureaucratic process of “passporting” developer contributions, (which themselves often take years to come through), via local councils, to NHS organisations and then finally onto GP surgeries that need to expand to cater for more patients, clearly needs to be radically speeded up, a point which I intend to pursue with Government Ministers.

As well as new physical buildings, an additional challenge is finding new GPs and other medical professionals to work in them. The establishment several years ago of a new Medical School at the Chelmsford campus of Anglia Ruskin University (ARU), an initiative which I strongly supported, may help in this respect. Within a couple of years, the first medical students should begin to graduate as Doctors from ARU (with around 100 or so then expected to do so each year). A number of these students are already working in Essex hospitals and GP practices and some of them will hopefully remain in Essex when they qualify. Via this route, we will hopefully be able to replenish or, over time, even increase the number of GPs working in Essex, as any increasing population will clearly require.

In fairness to the Government, it had already committed record amounts of additional spending to the NHS, even prior to the pandemic, with an increase of some £34 billion per year already programmed in by the end of this Parliament, under the NHS Long Term Plan. This significant extra investment will hopefully help boost NHS services in Essex, including in other vital areas, such as mental health too. However, it is also very important that extra resources being put into the NHS are focused on patient care and genuinely expanding NHS capacity, rather than on merely multiplying NHS bureaucracy.





Nonetheless, in addition to additional Government resources, paid for out of general taxation, I believe that property developers, who already make very comfortable profit margins from large scale housing developments, should be made to contribute considerably greater resources towards expansion of local NHS facilities than they do now, either via revised Section 106 agreements, the Community Infrastructure Levy (CLL), or similar instruments. This should be an important component of any new Local Plan.

#### Pressure on Education and school places

Educational standards across the Rochford District are generally high and across Essex as a whole, some 90% of schools are now rated as Good or Outstanding by OFSTED. Perhaps unsurprisingly, therefore, there is continued pressure on school places, especially at the most popular schools.

The four secondary schools in the Rochford District, which are all now Academies, have either all benefitted (or are now due to benefit) from upgrades and an expansion in capacity in recent years. In Rayleigh, both FitzWimarc and Sweyne Park schools now have their own sixth forms (I campaigned for and subsequently opened both of them) and FitzWimarc has recently opened a new block, paid for largely by a grant from the Department for Education (DfE). Sweyne Park has just completed construction of a new block of several additional classrooms, financed mainly in this instance by Section 106 contributions from major housing developments in the area.

Greensward Academy in Hockley also has a sixth form and benefitted from a major £14 million rebuild several years ago, paid for by the DfE following it becoming one of the first Academies to be established outside of the inner cities.

King Edmund School (KES) in Ashingdon, which also has a sixth form, is also now due for a major rebuild, following the discovery of serious building defects in some parts of the school buildings last year. Having recently been awarded a multi-million-pound grant from the DfE to help finance these new facilities, including a large new block of classrooms, it is now hoped that the new block will be open for KES pupils by the commencement of the 2023/24 academic year.

The sixth forms at all four schools have proved popular and have now begun to provide many pupils and their parents with a very viable alternative to the four grammar schools in nearby Southend. However, despite their four significant expansions, it will still be important to ensure that availability of places at these four major schools can keep pace with any increases in demand from additional house building, over the lifetime of the plan.





At primary school level, there has not been the same across the board expansion in capacity as at secondary level within the Rochford District. Essex County Council, as the Local Education Authority (LEA) uses a highly formulaic method of calculating the need for new school places at primary level, based largely on birth rate data from NHS Trusts, extrapolated forward to calculate the demand for school places several years on.

However, this method, which is updated on an annual basis, is not good at capturing additional demand created “in year”, by families moving into the District and rapidly requiring school places, before the commencement of the new academic year each September.

In fairness, Essex County Council has sometimes been willing to temporarily expand capacity at some primary schools (as for instance at Riverside Primary in Hullbridge, prior to the pandemic) but as an LEA, Essex is often slower to react to the need to expand places at primary rather than secondary level and popular schools, even when they have become Academies, are still often discouraged from further expansion by excessive, “Soviet style” bureaucracy at County Hall.

As one example of this, the new Countryside development in Rayleigh has set aside a plot for a new primary school, or alternatively ECC could expand capacity “offsite” at nearby primary schools instead – with the developer paying for either option, via already agreed Section 106 contributions. However, despite some *four years* of being asked to make a choice, of one or the other, ECC has still refused to take a decision. In my view, ECC’s highly dirigiste system for expanding school capacity at primary level, should be completely reviewed, from top to bottom, in order to allow successful schools to expand and to cater for any additional school places which may be required over the lifetime of RDC’s new Local Plan.

### Flood Risk

The issue of flooding and building in areas liable to flooding has long been an emotive issue in Essex, reaching back as far as the Great Flood of 1953, in which a number of Essex residents unfortunately lost their lives, including nearby on Canvey Island.

As well as the North Sea immediately to the East, there are a number of rivers in the Rochford District, including the Crouch and the Roach, plus a number of smaller tributaries and streams/brooks which permeate parts of the District, as far across as Rayleigh and Rawreth.

Given the pressure to release land for house building, there may be a temptation to recommend building in areas at potential risk of flooding, be it tidal or as a result of surface water run-off and/or local drainage systems being overwhelmed, during periods of exceptionally heavy rainfall (such as unfortunately happened in Rayleigh and some other parts of the District in 2014). Building major housing estates only increases these risks and adds to pressure on the already pressurised local drainage network.





Even allowing for modern flood management technology, such as Sustainable Drainage Systems (SUDS) on modern housing developments, it seems sensible, not least from both an environmental and safety standpoint, to strictly constrain house building ambitions in any areas which may be liable to flooding, for whatever reason. Again, given the specific geography and topography of the Rochford District, this is an important consideration in formulating any new Local Plan.

### Summary

Clearly, there has to be some limited future house building in the Rochford District, as young people cannot be expected to live at home with their parents into their 50's. Nevertheless, any such development has to be sustainable, both environmentally and economically.

Given the physical geography of the Rochford District and the constraints on its existing infrastructure, especially its road infrastructure, there should be strict limits on any major house building without major new investment in supporting infrastructure, whether financed by central Government; regional bodies, such as the South East Local Enterprise Partnership (SELEP), Essex County Council or property developers hoping to profit from future developments in the Rochford District, or a combination of all four.

In this response to RDC's consultation I have sought to flag up a number of key infrastructure issues, including transport constraints, growing pressures on local NHS services, competition for school places and the dangers of building in areas of potential flood risk, all of which will require significant investment, if future house building is to be achieved, without a detrimental effect on my constituents. I trust that these comments will be taken into account as RDC evolves its new Local Plan over the next two years or so.

In view of the repeated references to the need for infrastructure investment contained in this letter, I am copying this response to a number of potentially interested parties, in both central and local Government. These include the Rt Hon Michael Gove MP, the Secretary of State at the Ministry of Housing, Communities and Local Government (MHCLG) and his Housing and Planning Minister, Christopher Pincher MP. I have also sent it to the Rt Hon Sajid Javid MP, the Secretary of State for Health and Social Care; the Rt Hon Nadhim Zahawi, the Secretary of State for Education and to the Rt Hon Grant Shapps, the Transport Secretary, as well as to Christian Brodie, the Chairman of the South East Local Enterprise Partnership (SELEP), which includes Essex within its remit.

I have also copied it to County Councillor Kevin Bentley, the Leader of Essex County Council; County Councillor Lee Scott, Cabinet Member for Highways and Sustainable Transport at County Hall and also to County Councillor Tony Ball, ECC's Cabinet Member for Education and Lifelong Learning.





Copies have also been sent to Councillor Simon Wootton, Leader of Rochford District Council; Councillor Cheryl Roe, Deputy Leader of RDC; Councillor Ian Ward, the Executive Member for Planning at RDC and to Councillor Dave Sperring, Chairman of RDC's Committee overseeing the development on the new Local Plan.

Finally, I have also sent a copy to Ms Clare Panniker, the Chief Executive of the Mid and South Essex NHS Foundation Trust (MSENHSFT) and to Ms Yvonne Blucher, the Managing Director of Southend Hospital, as well as to Mr Anthony McKeever, the Joint Accountable Officer for the Mid and South Essex Health and Care Partnership (MSEHCP), as key local NHS leaders.

In addition, I will also shortly be posting a copy of this letter on my own constituency Facebook page, so that my constituents can see, for themselves, the detailed points which I have sought to raise on their behalf, even at this early stage of the evolution of RDC's new Local Plan.

Yours sincerely,

**Rt Hon Mark Francois MP**

Member of Parliament for Rayleigh and Wickford

CC Rt Hon Michael Gove MP, Secretary of State, MHCLG  
Christopher Pincher MP, Housing and Planning Minister, MHCLG  
Rt Hon Sajid Javid MP, Secretary of State, DOHSC  
Rt Hon Nadhim Zahawi MP, Secretary of State, DFE  
Rt Hon Grant Shapps MP, Secretary of State, DFT  
Christian Brodie, Chief Executive, SELEP  
County Councillor Kevin Bentley, Leader, ECC  
County Councillor Lee Scott, Cabinet Member for Highways Maintenance and Sustainable Transport, ECC  
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Councillor Simon Wootton, Leader of RDC  
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