

To: Development Management, Planning Officers, Rochford District Council

Application: 26/00641/FUL

Site: Land at the west side of the junction of Greensward Lane and Lower Road, Ashingdon, Essex

Proposal: Change of use of land to a 15-pitch Gypsy/Traveller site, with one static caravan and one or two touring caravans on each pitch, and ancillary works

Representation: Objection

Dear Sir or Madam,

Ashingdon Parish Council write to object to application **26/00641/FUL**.

This representation concerns the planning merits of this particular site and scheme. It does not object to meeting the properly assessed accommodation needs of Gypsies and Travellers, which should be addressed through suitable, sustainable and properly planned sites.

The proposal would establish a substantial residential caravan site accommodating up to 15 static caravans and potentially 30 touring caravans, together with access roads, hardstanding, parking, utility infrastructure, lighting, fencing, drainage works and other ancillary development. Its effects must therefore be assessed as a whole, rather than treating the proposal as a limited or readily reversible change of use.

For the reasons below, the application has not demonstrated that this is an acceptable location or that the development could take place without unacceptable harm. Permission should be refused.

1. Decision-making framework

Planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise. The National Planning Policy Framework is a material consideration, but it does not displace the statutory primacy of the development plan. The Council's adopted development plan presently includes the Core Strategy, adopted in 2011, and the Allocations Plan and Development Management Plan, adopted in 2014. [Rochford District Council GOV.UK](#)

The Council must identify:

- the site's adopted land-use designation;
- all relevant adopted policies;
- whether those policies remain consistent with the August 2026 NPPF;
- whether the site is Green Belt or otherwise protected countryside;
- the Council's current five-year supply of deliverable Traveller sites;
- the amount and nature of objectively evidenced unmet need; and
- whether the proposal satisfies the NPPF's site-specific policies despite any identified need.

An unmet need for pitches is relevant, but **need is not an automatic planning permission**. It cannot remove the need to demonstrate acceptable access, flood risk, drainage, landscape, ecology, amenity and infrastructure impacts. The

Government has expressly confirmed that Traveller-site applications remain subject to policies on environmental impacts, flooding, transport and environmental quality.

[MHCLG](#)

2. Green Belt and countryside harm

If the application site lies in the Green Belt, the Council must apply Chapter 13 of the August 2026 NPPF rigorously.

A permanent 15-pitch residential caravan development, together with static and touring caravans, internal roads, extensive hardstanding, parking, utilities, fencing, lighting and ancillary structures, would introduce a substantial developed and domesticated enclave onto currently open land. Its effect would not be limited to the footprint of individual caravans. The whole development would affect openness through its spatial extent, visual presence, activity, vehicles, lighting and permanent residential use.

The proposal would appear to result in:

- a material loss of Green Belt openness;
- encroachment of built development and urbanising uses into the countryside;
- fragmentation and domestication of an open site;
- cumulative erosion of the countryside around Ashingdon and Hockley; and
- harm arising from lighting, parked vehicles, boundary treatments, domestic paraphernalia and year-round occupation.

If the site is claimed to constitute grey belt, that does not make development automatically acceptable. The Council must undertake and publish a reasoned assessment against the NPPF definition and policies, including the site's contribution to Green Belt purposes and whether all policy criteria are met.

The August 2026 NPPF contains express provisions concerning evidenced unmet Traveller accommodation need and Green Belt applications. It also confirms that the Green Belt "Golden Rules" do not apply to Traveller sites. That exemption does **not**, however, remove the need to assess Green Belt status, openness, purposes, site suitability and all other relevant policies. [National Planning Policy Framework](#)

If the Council concludes that the proposal remains inappropriate development, it should give substantial weight to Green Belt harm and identify whether other harm exists. Permission should not be granted unless the necessary policy test is fully satisfied.

If the site is outside the Green Belt, the same physical effects remain relevant as countryside, landscape, character and visual-impact objections.

3. Excessive scale and poor landscape integration

A 15-pitch site of the intensity proposed is not a minor rural use. With potentially three caravans on each pitch, the application could permit **up to 45 caravans**, before accounting for cars, vans, hardstanding, amenity buildings, storage, bin areas and infrastructure.

The development would be likely to appear as a conspicuous, suburbanising compound rather than a form of development responding positively to the area's rural character. Existing or proposed planting cannot make inappropriate development acceptable. Landscaping takes years to establish, can fail or be removed, and does not eliminate the effects of lighting, vehicle movements, caravan roofs and year-round activity.

Before determining the application, the Council should require:

- a proportionate landscape and visual impact assessment;
- verified viewpoints from Lower Road, Greensward Lane, nearby homes and public routes;
- existing and proposed sections showing levels and caravan heights;
- a complete boundary-treatment and lighting plan;
- an arboricultural survey and root-protection plan;
- a long-term landscape management plan; and
- assessment during winter, when screening is least effective.

Without that information, the Council cannot reliably assess the development's full visual and landscape effects. Permission should not be granted on the assumption that generic screening can resolve them.

4. Unsustainable location

The Council should assess whether future residents would have safe and realistic access to schools, healthcare, shops, public transport, employment and other day-to-day services without undue reliance on private vehicles.

A rural site may be acceptable in principle, but the NPPF still requires sustainable development and patterns of movement. The application should provide an objective audit of:

- walking routes and their lighting, width and condition;
- safe pedestrian crossing opportunities;
- public-transport routes, frequency and operating hours;
- cycling connections;
- distances to schools, shops and healthcare;
- accessibility for children, disabled people and those without a car; and
- the cumulative transport demand associated with 15 households.

A site should not be described as sustainable merely because services exist within a broad radius. Routes must be **safe, convenient and usable in practice**. If occupants would be forced to walk along roads without adequate footways or cross at an unsafe junction, the location is unsuitable for the scale of residential use proposed.

5. Highway safety and access

The development could generate frequent movements by cars, commercial vehicles, touring caravans, service vehicles, refuse vehicles and emergency vehicles. Those movements would be concentrated at or close to the junction of Greensward Lane and Lower Road.

The application must demonstrate, rather than assume:

- adequate visibility splays in both directions;
- safe entry and exit by vehicles towing caravans;
- sufficient access width and geometry;
- safe pedestrian movement;
- no unacceptable conflict with existing junction movements;
- adequate turning space so vehicles can enter and leave in forward gear;
- satisfactory access for fire appliances, ambulances and refuse vehicles;
- adequate parking within every pitch;
- no overspill parking or obstruction of the highway;
- structural suitability of the access for heavy vehicles; and
- acceptable cumulative effects on the local road network.

Visibility must be achievable over land controlled by the applicant or the highway authority and capable of being maintained permanently. It should not depend upon removing third-party vegetation or informal arrangements outside the applicant's control.

A 15-pitch development should be supported by a robust transport statement using realistic trip-generation assumptions, including movements by towing vehicles and commercial-type vehicles where relevant. In the absence of adequate evidence, the Council cannot conclude that there would be no unacceptable highway-safety impact.

6. Flood risk and surface-water drainage

Flooding and drainage require especially careful assessment at this location. The Council's own records refer to flooding affecting Greensward Lane, including raised manhole covers and the road beneath the railway bridge becoming impassable after heavy rain. Council records also identify flooding issues affecting Lower Road/Ashington Road. [Rochford Flood Advisory Group](#) [Rochford District Council](#)

The proposed caravans, buildings, roads and hardstanding would reduce permeability and could increase the rate and volume of runoff. Caravans are also treated as a vulnerable use for flood-risk purposes, making safe siting and evacuation particularly important.

The application should not be approved unless it is supported by a site-specific flood-risk and drainage assessment addressing:

- all sources of flooding, including river, surface water, sewer, groundwater and ordinary watercourse flooding;
- present and future climate-change allowances;
- existing drainage routes, ditches and field runoff;
- infiltration testing undertaken at appropriate locations and depths;
- existing and proposed impermeable areas;
- greenfield runoff rates and discharge volumes;
- exceedance routes during events beyond the system's design capacity;
- maintenance responsibility for the site's lifetime;
- foul-water disposal and confirmed capacity;
- effects on neighbouring land, roads and downstream properties;
- safe access and escape during a flood event; and
- the cumulative impact alongside other development.

The NPPF requires a sequential, risk-based approach. Where applicable, development should not be located in an area at risk if reasonably available sites suitable for the use exist in areas of lower risk. Sustainable drainage should be integral to the design, not deferred to a generic condition. [National Planning Policy Framework](#)

Given the documented local history, a condition simply requiring later approval of drainage details would be inadequate if the principle, capacity or deliverability of drainage has not first been established.

7. Ecology and biodiversity net gain

The conversion of undeveloped land to a residential caravan site can affect grassland, hedgerows, trees, drainage features and habitat connectivity. It can also cause indirect effects through lighting, domestic animals, noise, vehicle movements and increased human activity.

Before determination, the Council should have sufficient current ecological evidence to establish:

- the habitats present and their condition;
- protected and priority species likely to be affected;
- the value of hedgerows, trees, ditches and field margins;
- impacts of access construction and visibility splays;
- impacts of external lighting on bats and other wildlife;
- the correct pre-development biodiversity baseline;
- whether earlier clearance or site works affected that baseline;
- the statutory biodiversity net-gain calculation;

- the location, legal security and long-term management of mitigation; and
- whether a Habitats Regulations Assessment is required because of recreational or other effects on protected sites.

Where works took place before the application was determined, the biodiversity baseline must be handled in accordance with the statutory rules and must not allow clearance to reduce the applicant's obligation artificially.

A competent authority cannot defer the fundamental question of whether protected species or designated sites would be harmed. The mitigation hierarchy must be followed: avoid harm first, then mitigate, and compensate only as a last resort.

8. Residential amenity and environmental quality

The Council must assess the relationship between the proposed site and existing homes. Relevant effects include:

- vehicle movements and headlight glare;
- noise from arrivals, departures and on-site activity;
- external lighting;
- overlooking and loss of privacy;
- smoke and odour;
- waste storage and collection;
- drainage and sewage;
- boundary security;
- construction disturbance; and
- the cumulative intensity of up to 15 residential pitches.

The test is not whether all residential development causes some activity. It is whether the scale, layout and operation of this development would secure a high standard of amenity for both existing and future occupiers.

The layout should provide adequate separation, private amenity space, fire separation, safe circulation and protection from road noise and pollution. A proposal should not be approved if reasonable living conditions depend on extensive opaque fencing, excessive lighting or other measures that would themselves cause landscape harm.

Any suggestion of business or commercial activity should be clarified. If such activity forms part of the intended use, its character, hours, vehicles, storage and noise must be assessed now. It should not be left ambiguous or controlled only after permission has been granted.

9. Site layout, fire safety and emergency access

The density and arrangement of static and touring caravans require close scrutiny. The Council should consult the fire and rescue service and environmental-health or site-licensing officers before determining the application.

The submitted layout must demonstrate:

- safe separation between caravans;
- emergency-vehicle access to all pitches;
- suitable fire points and water supplies;
- safe turning and escape routes;
- adequate refuse collection;
- foul and surface-water infrastructure;
- accessible routes;
- safe electricity and utility arrangements; and
- no dependence on informal overflow areas.

Planning permission should not be granted for a maximum-density arrangement with the expectation that licensing controls will later resolve an intrinsically cramped or unsafe layout. Planning and licensing are separate regimes, and the planning layout must be acceptable in its own right.

10. Heritage and archaeology

The application should identify all designated and non-designated heritage assets whose setting could be affected, as well as any archaeological potential.

The Council must understand the site's historic landscape context and assess whether caravans, hardstanding, fencing, lighting and activity would affect the significance or setting of any asset. If archaeological potential exists, an appropriate desk-based assessment and, where necessary, field evaluation should precede determination rather than be deferred until after the principle of development has been accepted.

11. Infrastructure and utilities

Fifteen permanent residential pitches represent a material demand on local infrastructure. The Council should obtain clear evidence about:

- potable-water supply;
- foul-drainage capacity;
- electricity provision;
- refuse and recycling arrangements;
- access to healthcare and education;
- emergency-service access; and
- any necessary off-site works or financial contributions.

No weight should be given to infrastructure said to be available unless its capacity and deliverability are confirmed by the relevant provider. Private treatment systems

should be accepted only if connection to the public sewer has been properly investigated and environmental effects are demonstrated to be acceptable.

12. Traveller-site need does not outweigh unresolved site harm

The Council's evidence base includes a 2024 Gypsy and Traveller Accommodation Assessment and an August 2025 supplementary need statement reflecting the changed national definition. The Council should publish an up-to-date position for this decision, including its assessed need, permissions, completions and five-year deliverable supply. [Rochford evidence base](#) [Rochford need statement](#)

If a shortfall exists, that is capable of attracting significant weight. It does not follow that every unallocated site is suitable or that all adverse impacts must be accepted. The decision must distinguish between:

- the general need for accommodation;
- any personal need associated with identified intended occupants;
- the suitability of this particular location;
- the environmental and infrastructure effects of 15 pitches; and
- whether a smaller or alternative scheme would avoid the identified harm.

The Council should also establish whether the proposed occupants fall within the applicable NPPF definition where policy treatment depends on that status. Any confidential personal circumstances can be handled appropriately, but the policy basis and weight given to them must be explained transparently in the officer report.

13. Part-retrospective character and enforcement history

The Council describes the application as **part retrospective**. It records that development works began without the necessary permission, that a Temporary Stop Notice was served, and that the High Court granted an interim injunction. Those enforcement proceedings are separate from the planning decision. [Rochford District Council](#)

The application must therefore be determined neither more harshly nor more favourably merely because works have commenced. No weight should be given to the cost of unauthorised works, the inconvenience of reversing them, or a claimed fait accompli.

The Council should ensure that:

- the application plans accurately show all works undertaken;
- any pre-development levels, habitats and drainage features are recorded;
- the description includes the whole development requiring permission;
- retrospective works have not prejudiced ecological or archaeological assessment;
- no unauthorised occupation is treated as creating a presumption in favour; and

- enforcement and injunction issues remain procedurally separate.

If works have altered the site so that the previous condition cannot be assessed reliably, the applicant should provide appropriate dated surveys, photographs and other evidence.

14. Prematurity and plan-led provision

The Council is preparing a new Local Plan and has assembled updated evidence regarding Traveller need and potential site provision. That does not necessarily make the proposal premature in the technical NPPF sense. It does, however, reinforce the importance of a **plan-led comparison of reasonable alternatives**, particularly for a large site with potentially significant Green Belt, transport and environmental consequences.

The Council should explain whether this site has been assessed through its site-selection process, what constraints were identified, and why an unallocated 15-pitch site should be permitted ahead of properly tested and planned provision. Emerging policies should receive only the weight justified by their stage, consistency and unresolved objections.

15. Information required before determination

The application should not be determined favourably until the Council has received, consulted upon and independently assessed:

- confirmation of the site's Green Belt and other designations;
- an up-to-date five-year Traveller-site supply statement;
- a detailed planning-policy assessment against the August 2026 NPPF;
- a complete and dimensioned site layout;
- landscape and visual assessment;
- transport statement and access drawings;
- visibility-splay and vehicle-tracking evidence;
- flood-risk and drainage assessments;
- foul-drainage details and capacity confirmation;
- ecological surveys and a biodiversity net-gain assessment;
- arboricultural information;
- external-lighting details;
- heritage and archaeological assessment where required;
- utilities and waste arrangements;
- fire-safety and emergency-access consultation; and
- a clear statement of all intended ancillary and commercial uses.

If material new information is submitted, neighbours and consultees should receive a fair opportunity to comment before the application is decided.

Requested decision

For the reasons above, the proposal has not demonstrated that a permanent 15-pitch development in this location would accord with the development plan and the NPPF. The identified concerns are fundamental matters of principle, scale, location and impact, not merely details capable of being resolved by condition.

I therefore request that Rochford District Council **refuse planning permission**, for reasons encompassing, as applicable:

1. inappropriate or otherwise harmful development in the Green Belt, including loss of openness and countryside encroachment;
2. unacceptable landscape and visual harm;
3. an unsustainable location and excessive dependence on private vehicles;
4. inadequate demonstration of safe access and highway operation;
5. unresolved flood risk, surface-water and foul-drainage effects;
6. insufficient ecological and biodiversity-net-gain evidence;
7. unacceptable or inadequately assessed effects on residential amenity;
8. inadequate evidence concerning site layout, fire safety, utilities and infrastructure; and
9. failure to demonstrate that accommodation need and other benefits clearly outweigh the totality of harm.

If officers are nevertheless minded to recommend approval, the application should be referred to the Planning Committee. The report should address each issue above expressly, identify the weight afforded to need and personal circumstances, and explain why any outstanding matter can lawfully and effectively be dealt with by condition.