

Land North of Hall Road, Rochford

Rochford District Council

Planning Statement

Prepared on behalf of Bellway Homes Ltd

April 2010

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1.0 INTRODUCTION

- 1.1 This Statement is submitted in support of the application by Bellway Homes Ltd (Bellway) in respect of land to the north of Hall Road, Rochford. The application is submitted in outline with all matters reserved except access. Permission is sought for 600 dwellings, together with a new primary school, and associated open space and landscape works. The site falls within the Metropolitan Green Belt.
- 1.2 Land to the west of Rochford is identified in the emerging Core Strategy as a 'location of growth'. The Core Strategy has been submitted to the Secretary of State with the hearing sessions of the Examination scheduled to commence on 11 May 2010. The Core Strategy seeks to address the strategic housing requirements set out in the East of England Plan (May 2008) (EEP) up to 2025. The EEP sets a housing requirement, expressed as a minimum, of 250 dwellings per annum (2006 to 2021), with this annual rate to be continued beyond 2021 in advance of a review.
- 1.3 The Council has acknowledged that the release of Green Belt land is required to meet the District's strategic housing requirement, including maintaining a 5 year supply of housing land as required by Para 54 of PPS3. In short, the Council concede that it cannot demonstrate 5 years' supply of deliverable housing land for the purposes of PPS3 without reliance upon new sites (currently within the Green Belt) to be confirmed through the LDF process. The emerging Site Allocations DPD (Issues and Options) (February 2010) identifies three potential options for the form of development at Hall Road. Bellway has submitted extensive representations to the emerging Core Strategy and will continue to promote the site through the LDF process.
- 1.4 The land at Hall Road is available, suitable and achievable. It is important to note that on the Council's own assessment of housing land supply, as a number of Green Belt sites will be required to be released to maintain housing land supply, the release of land at Hall Road, now, would be consistent with the emerging DPDs.
- 1.5 The development of land within the Green Belt for residential and associated purposes constitutes inappropriate development as defined at Para 3.1 of PPG2. As such, it falls upon Bellway to demonstrate 'very special circumstances' to justify the release of Green Belt land. It is accepted that the shortage of housing land can constitute a 'very special circumstance'. However, in considering the merits of the release of individual sites to help meet housing requirements, there is a need to demonstrate the comparative merits of the site as considered against other

potential sites to ensure that the public interest of maintaining the Green Belt is best served.

1.6 Para 71 of PPS3 advises that where Local Planning Authorities are unable to demonstrate 5 years' supply, applications for residential development should be considered favourably having regard to the criteria set out at Para. 69, namely:

- Achieving high quality housing.
- Ensuring developments achieve a good mix of housing reflecting the accommodation requirements of specific groups, in particular, families and older people.
- The suitability of a site for housing, including its environmental sustainability.
- Using land effectively and efficiently.
- Ensuring the proposed development is in line with planning for housing objectives, reflecting the need and demand for housing in, and the spatial vision for, the area and does not undermine wider policy objectives e.g. addressing housing market renewal issues.

1.7 Accordingly, it falls upon Bellway to demonstrate the merits of the application in this particular context.

2.0 THE APPLICATION

2.1 The application is submitted in outline with all matters reserved except access. The application is parameters based. The Parameters Plan (Drawing Number PL-03) sets out the key principles of development. Planning permission is sought in outline with all matters reserved except access for a development with the following components:

- 600 residential units as a mix of sizes and densities;
- Creation of a high quality open space and landscape feature to the west and north site to provide a new boundary to the Green Belt;
- Provision of a strategic planting buffer on the western edge to maintain the character and openness of the Green Belt;
- Provision of two principal site access points from Hall Road;
- An area of at least 1.1 ha for a new primary school including playing fields in the centre of the development;
- Creation of pedestrian and cycle links to the town centre;
- Provision of sustainable drainage systems;
- Retention and enhancement of Tree Preservation Orders on Hall Road ; and
- Retention of views towards key features to enhance the sense of place.

2.2 The description of development as set out in the application forms is:

“Residential Development (Class C3) of 600 dwellings, associated access and a new primary school on Land north of Hall Road, Rochford. Such development to include the infrastructure associated with residential development, public open space and new vehicular and pedestrian access routes.”

Planning Performance Agreement

2.3 Bellway has entered into a Planning Performance Agreement (PPA) with Rochford District Council (the Council) as local planning authority. The objectives of the PPA are as follows:

1. To establish a shared commitment to an agreed timetable towards the assessment, consideration and determination of a planning application in due course.
2. To identify determining issues and agree steps to resolve them wherever possible.
3. To identify and address the detailed requirements of any planning conditions and planning obligations which would be necessary should a planning application be deemed acceptable in principle, subject to such matters.
4. To achieve the determination of an outline planning application relating to the development of the Land North of Hall Road to provide for 600 residential units (Class C3) associated access and a new primary school. Such development will include the infrastructure associated with residential development, public open space and new vehicular and pedestrian access routes.

Consultation and Community Engagement

2.4 The PPA outlines a schedule of consultation to be undertaken by Bellway. In summary:

1. Community consultation will be undertaken in line with the Council's Statement of Community Involvement post submission of the planning application. Consultation to concentrate on local residents, parish councils and interested parties such as the Environment Agency, CABE, Essex County Council (including as Highway Authority), Rochford District Council, the Crime Prevention Design Advisor and Natural England.
2. The Council will undertake normal consultations both statutory and non-statutory including the local residents.

3. A letter will be sent to residents prior to submission informing them of the forthcoming planning application with a public exhibition to be held within 21 days from submission. This will enable residents to view and comment on the application prior to the end of the Council's consultation period.

Deliverability, Build-out Rates and Phasing

- 2.5 The residential element can be delivered within a seven year period, as per the following programme:

- 2010: Apply and achieve a grant of outline planning permission
- 2011 (reserved matters application approved)
- 2012: Site preparation works and delivery of 50 dwellings
- 2013: Deliver 150 dwellings
- 2014: Deliver 150 dwellings
- 2015: Deliver 100 dwellings
- 2016: Deliver 100 dwellings
- 2017: Deliver 50 dwellings

- 2.6 In line with policy H2 of the emerging Core Strategy 450 dwellings will be delivered by April 2015. This phase will also include the primary school. A further 150 dwellings will be delivered in 2016 and 2017.

3.0 THE APPLICATION SITE

- 3.1 The Site comprises 33.45 ha and forms a rectangular area of land abutting the western built up edge of Rochford. It is currently in agricultural use. It is bounded by Hall Road to the south. There are a number of large detached residential properties located immediately to the south of Hall Road. The Site is also surrounded by large ditches along its western, northern and eastern boundaries as well as in part along its southern boundary. The site is enclosed and contained on its northern boundary by a tree belt approximately 15 metres in height and a substantial hedgerow approximately 5 - 6 metres in height comprising oak, ash, maple, hawthorn and blackthorn species. Ironwell Lane lies to the north of the Site, and a footpath crosses it, north-south, linking Ironwell Lane to Hall Road.
- 3.2 The Site has an open character due to its agricultural (arable) land use. However the close proximity to local roads and existing residential areas to the south and east, as well as its robust boundary vegetation mean that it is well screened in local views and is well related and connected to the existing urban area.
- 3.3 The Site is located 1000m from Rochford Town Centre and 600m from Rochford Railway Station. Existing bus services run from the station to Southend and Rayleigh. Measured from the centre of the Site, Southend Airport is located 2km to the south. The nearest employment centres are in the town centre and the employment zone adjacent to the airport on Orchard Way.

Designations

- 3.4 The Site is generally level and was designated in the Replacement Rochford Local Plan (2006) as Green Belt countryside (Policy R2). The majority of the Site falls within Flood Zone 1. A small part in the north east corner designated as flood Zone 2; but following analysis by Ardent Consulting of the detailed Topographical Survey, the Flood Risk Assessment that accompanies the application demonstrates that the application site falls within Flood Zone 1. Further information can be found in the Flood Risk Assessment.

4.0 PLANNING HISTORY

- 4.1 The area forming the Site has not been subject to any previous applications for planning permission.

5.0 PLANNING POLICY CONTEXT

- 5.1 The development plan comprises the EEP and the saved policies of the Rochford Local Plan (2006). The Local Plan was prepared in response to the requirements of the Essex Structure Plan and predates the EEP. Accordingly, the Local Plan, in particular in so far as it relates to matters of housing land supply is largely out of date. The application site is identified in the adopted local plan as falling within Metropolitan Green Belt. Indeed, much of the land outside of the defined urban areas is defined as Green Belt, or flood zone, or both.
- 5.2 The EEP sets the strategic housing requirements for Rochford to 2021. Policy H1 identifies a need in Rochford to provide for 250 dwellings per annum in the period 2006 to 2021, based on completions 2001 to 2006 of 4,600 dwellings. Para 5.4 of the EEP advises that Local Planning authorities should plan for an upward trajectory of housing completions, seeking first to achieve the annual average development rates for 2006-21 as soon as possible, then to make up any shortfall from the period before that rate is achieved. Where, as is the case here, the emerging Core Strategy seeks to plan for a period beyond 2021, the EEP advises that the annual rate should be continued in advance of any review.
- 5.3 The Core Strategy has reached an advanced stage, being submitted to the Secretary of State on 18 January 2010, with the hearing stage of the examination scheduled to commence on 11 May 2010.
- 5.4 The Core Strategy identifies a need to release land to accommodate some 3,790 dwellings between 2006 – 2021 in addition to sites already with permission or the subject of previous allocations in the Local Plan (Para 4.4). Rochford, Rayleigh and Hawkwell are identified as 'Tier 1 settlements', where the broadest range of local services and facilities are provided and should act as the focus for growth.
- 5.5 Land to the west of Rochford is identified at Policy H2 (Extensions to residential envelopes and phasing), to provide for 450 dwellings by 2015, and a further 150 dwellings between 2015 - 2021. Appendix H1 outlines the infrastructure that will be provided with the allocation and Policy CLT1 sets out the provision planning obligations that the Council will expect from developers. The Council has identified a need for the following new infrastructure and services to accompany residential development:

- New primary school
- Local highway capacity and infrastructure improvements
- Public transport infrastructure improvements and service enhancements
- Link and enhancements to local pedestrian / cycling and bridleway network
- Enhanced pedestrian access to town centre
- Hall Road Junction improvements
- Sustainable drainage systems
- Public open space
- Play space
- Youth facilities and community facilities
- Link to cycle network

5.6 The emerging Core Strategy has been informed by the preparation of a Strategic Housing Land Availability Assessment (SHLAA) and a Strategic Environmental Assessment (SEA). Land to the West of Rochford is considered in the SHLAA in appendix C. Page 105 of the document states,

“The site is situated in the proposed strategic location for housing as set out in the Core Strategy. It is within close proximity to local amenities and has the potential to provide infrastructure improvement for Rochford.”

5.7 Bellway has submitted extensive representations in support of the identification of land at Hall Road to help meet the strategic housing requirements of the District.

5.8 The Council has recently published the ‘Issues and Options’ draft Site Allocations DPD for consultation until 30 April 2010. The application site is identified at page 15 as providing 600 dwellings, a primary school, public open space, youth and community facilities and play space. Four options are presented by the Council as to how the land at Hall Road could be developed.

5.9 Accordingly, the release of land at Hall Road, in the manner proposed, accords with the Council’s proposed strategy as set out in the emerging Core Strategy and Site Allocations DPD and is consistent with the principles established by the EEP.

5.10 The following regional and local policies are relevant to the proposal.

East of England Plan

- Policy SS1 - Achieving Sustainable Development
- Policy SS2 - Overall Spatial Strategy
- Policy SS4 - Towns other than Key Centres and Rural Areas
- Policy H1 - Regional Housing Provision 2001–2021
- Policy H2 - Affordable Housing (35% across the region)
- Policy T14 - Parking
- Policy ENG1 - Carbon dioxide emissions and Energy Performance

Rochford Local Plan 2006

- CS1 Moving towards Sustainable Development
- CS2 Protecting and enhancing the built and natural environment
- CS6 Promoting good design and design statements
- CS7 Conserving and enhancing heritage
- CS8 Retaining character of place
- HP6 Design and layout
- HP7 Energy & water conservation
- HP8 Affordable housing
- HP10 Crime prevention
- HP21 Planning Obligations

Supplementary Planning Documents

- Countywide
 - Essex Design Guide (October 2005)
 - Urban Place Supplement (March 2007)
- Local
 - SPD1 - Educational contributions
 - SPD2 - Housing design
 - SPD3 - Playing pitch strategy
 - SPD5 - Vehicle parking standards
 - SPD7 - Design, landscaping and access statements

5.11 The Design and Access Statement sets out the principles of development. As the application is submitted in outline, the development control policy matters raised by policy will largely be determined at the reserved matters stage.

6.0 HOUSING LAND SUPPLY

6.1 As stated, the application constitutes a departure from the development plan and will result in 'inappropriate development' within the Green Belt. However, there is a shortfall in the 5 year housing land supply which constitutes very special circumstances and justifies the grant of permission.

6.2 The housing requirement for the district is set by the East of England Plan (EEP) May 2008, which identifies a requirement 2001 to 2021 of 4,600 dwellings. Allowing for completions to 2008 (see 2009 AMR) of 1429, the residual requirement is 3171. Policy H1 of the EEP requires the annualised requirement of 250 dwellings (2006 - 2021) to be rolled forward to 2026 in advance of the review of RSS. Importantly, the housing requirement in RSS is expressed as a minimum. The Council's policy response, which includes the release of green field sites, currently within the Green Belt, is set out in the emerging Core Strategy with the most recent completions data set out in the Annual Monitoring Report (2009) (AMR).

6.3 Para 5.4 of the EEP advises that:

"Local planning authorities should plan for an upward trajectory of completions, seeking first to achieve the annual rates for the period 2006-2021 as soon as possible and then to make up any shortfall from the period before the rate is achieved."

6.4 The Council's response must be viewed in the context of the requirement set out in Policy H1 to plan for 15 years, and demonstrate 5 years' housing land supply. The Core Strategy is predicated on the basis that the release of Green Belt sites is required to meet housing land requirements, both over the entire plan period and to maintain 5 year housing land supply.

6.5 The Submission draft of the Core Strategy (see table at Para 4.6) identifies a need for 751 dwellings to be released on Green Belt land to meet requirement to 2015 (i.e. to maintain 5 year land supply) and 994 dwellings in the period to 2021 (see table at Para 4.6). The post 2021 'future allocations' estimates are all Green Belt. There is an agreed shortfall in housing land supply and an acknowledgement by the Council that the release of Green Belt land is required. We consider that the actual shortfall, and hence the requirement to be met by Green Belt sites, is far greater

than the 751 estimated. However, there is, for current purposes, no need at this stage to demonstrate the position in that the Council's own assessment has indicated substantially less than 5 years housing land supply.

6.6 On this basis, the Council should consider the application favourably having regard, amongst other matters, to the criteria set out at Para 69 of PPS3. Furthermore, once established, a shortfall in 5 year housing land supply can constitute 'very special circumstances' for the purposes of Para 3.2 of PPG2 and, thereby, significantly justify the grant of permission.

6.7 It is also of note that the Council, in recognising the shortfall in housing land supply, propose the release of land to the west of Rochford to provide some 450 dwellings in the period to 2015 and 600 dwellings in total. The emerging Site Allocations DPD identifies a number of development options consistent with the application site.

7.0 GREEN BELT MATTERS: VERY SPECIAL CIRCUMSTANCES AND ALTERNATIVES

7.1 PPG2 confirms the principle of preserving the Green Belt and that 'inappropriate development' ought to be resisted unless 'very special circumstances' justify otherwise. There is of course no definition of very special circumstances in PPG2 though guidance is provided by case law and previous decisions of the Secretary of State. The absence of a 5 year supply of available, suitable and achievable sites as required by Para 54 of PPS3 has been held by the Secretary of State in several decisions to constitute very special circumstances.

7.2 Accordingly, on the basis of an agreed shortfall in 5 year housing land supply and the accepted need to release Green Belt land to maintain 5 year land supply, then 'very special circumstance's do exist and warrant the release of Green Belt land.

7.3 In considering the merit of releasing individual sites, in such circumstances there is a need to consider the availability and suitability of alternatives. The legal principles were recently restated by the Court of Appeal in Governing Body for Langley Park School for Girls v Bromley LBC and Langley Park School for Boys [2009] EWCA Civ 734. There, it was explained by Lord Justice Sullivan:

44. All other things being equal, the less the injury that would be caused by the application proposal, the less would be the need ... to consider whether that injury might be reduced by a revised siting of the proposed new buildings within the MOL site. Where there are no clear planning objections to a proposed development alternative proposals (whether for an alternative site, or a different siting within the same site) will normally be irrelevant: see R (On the application of Mount Cook Land Ltd.) v Westminster C.C. [2003] EWCA Civ. 1346, [2004] 2 P & CR 405, per Auld L.J. at para. 33.

45. Where there are clear planning objections to a proposed development, e.g. because it would injure the openness and visual amenity of MOL ... the more likely it is that it will be relevant, and may in some cases be necessary, to consider whether that objection could be overcome by an alternative proposal. See Trusthouse Forte Hotels Ltd. V Secretary of State for the Environment (1986) 53 P & CR 239, per Simon Brown J. (as he then was) at p.299:

“Where, however there are clear planning objections to development upon a particular site then it may well be relevant and indeed necessary to consider whether there is a more appropriate alternative site elsewhere.”

52. It does not follow that in every case the “mere” possibility that an alternative scheme might do less harm must be given no weight. In the Trusthouse Forte case the Secretary of State was entitled to conclude that the normal forces of supply and demand would operate to meet the need for hotel accommodation on another site in the Bristol area even though no specific alternative site had been identified. There is no “one size fits all” rule. The starting point must be the extent of the harm in planning terms (conflict with policy etc.) that would be caused by the application. If little or no harm would be caused by granting permission there would be no need to consider whether the harm (or the lack of it) might be avoided. The less the harm the more likely it would be (all other things being equal) that the local planning authority would need to be thoroughly persuaded of the merits of avoiding or reducing it by adopting an alternative scheme. At the other end of the spectrum, if a local planning authority considered that a proposed development would do really serious harm it would be entitled to refuse planning permission if it had not been persuaded by the applicant that there was no possibility, whether by adopting an alternative scheme, or otherwise, of avoiding or reducing that harm.

53. Where any particular application falls within this spectrum; whether there is a need to consider the possibility of avoiding or reducing the planning harm that would be caused by a particular proposal; and if so, how far evidence in support of that possibility, or the lack of it, should have been worked up in detail by the objectors or the applicant for permission; are all matters of planning judgment for the local planning authority ... ”.

7.4 The emerging Core Strategy and related DPDs clearly provide the mechanism for the consideration of alternatives. However, in advance of the adoption of the relevant DPD, the applicant ought to justify the merit of the proposals having regard to the availability and merit of alternatives.

- 7.5 We have undertaken an assessment of alternative sites, as set out in the accompanying assessment.
- 7.6 The assessment has been based upon the sites promoted to the Council through the SHLAA process and other additional sites that have been the subject of application(s) subsequently. The assessment seeks to consider the availability and suitability of sites having regard to designated constraints and the relationship of the proposed sites to existing settlements and communities, i.e. the degree to which the scheme would meet the 'planning for housing objectives' as defined by the criteria at Para 69 of PPS3.
- 7.7 The Council estimates that some 2,745 dwellings are required to meet housing requirements on Greenfield land in the period to 2025, with 751 of those in the period to 2015. The SHLAA identified some 22 Green Belt Sites in Strategic Growth Location. In total these sites can accommodate 4,810 dwellings.
- 7.8 We have undertaken a review of these sites against a range of criteria, namely:
- 1) Has the site been identified as suitable, achievable and deliverable in the next 5 years in the SHLAA?
 - 2) Is the site subject to additional designations?
 - 3) Would the site result in development in a 'gap' or similar?
 - 4) Would the development result in coalescence?
 - 5) Can a defensible Green Belt boundary can be provided?
 - 6) Would the development result in the extension to a Tier 1 settlement as identified in the emerging LDF?
 - 7) Has the site been promoted by a developer?
 - 8) Does the site lies within close waling distances of local services and facilities as defined by PPG13 Best Practice guide (1998)?

- 7.9 When those sites that are designated as falling within the flood plain and would result in the expansion of secondary settlements, for example, are discounted, some 9 sites remain. These sites then fall to be considered on their detailed merits, the relationship to the existing settlements, transport and access, landscape and visual impact. The objective ought to be identify those sites that have the least impact upon the openness of the Green Belt and result in the more favourable scheme and benefit to the community.
- 7.10 The Site is demonstrated as relating well to the existing community, within close proximity of local services and the mainline rail station. It is well located in relation to the existing employment opportunities. The development can be integrated into the landscape. Whilst the scheme will result in the loss of Green Belt, any effect will be localised and a new and defensible Green Belt boundary can be readily established.
- 7.11 It is these clear benefits and characterised that no doubt underlies the Council's identification of the area west of Hall Road for housing growth in the Submission Core Strategy and the various options identified in the Issues and Options Draft of the Site Allocations DPD

8.0 PLANNING FOR HOUSING OBJECTIVES

8.1 As stated, Para. 71 of PPS3 advises that where Council's are unable to demonstrate 5 years supply of deliverable sites, they should consider applications for housing favourably having regard to, inter alia, the criteria set out at Para. 69.

8.2 Para. 69 sets out 5 criteria to which Council's should have regard in determining planning applications:

- Achieving high quality housing;
- Ensuring developments achieve a good mix of housing reflecting the accommodation requirements of specific groups, in particular families and older people;
- The suitability of the site for housing, including its environmental suitability;
- Using land effectively and efficiently;
- Ensuring the proposed development is in line with planning for housing objectives, reflecting the need and demand for housing in, and the spatial vision for, the area and does not undermine wider policy objectives e.g. addressing housing market renewal issues.

8.3 We suggest that the above provides a useful mechanism of considering the merits of the application. The Council has identified land to the west of Rochford to be released from the Green Belt to help meet the strategic housing requirements. The grant of permission would therefore be consistent with the emerging Core Strategy.

Quality

8.4 The application is accompanied by a Design and Access Statement and a Landscape Visual Impact Assessment. The application is parameters based and the DAS demonstrates how the parameters will set the principles of development in a manner that enables the provision of a quality development.

8.5 The development will be consistent with the principles set out in the emerging Core Strategy with all development built to Lifetimes Homes Standards (where applicable)

and to the prevailing Code (Code for Sustainable Homes) in accordance with emerging CS policies ENV9 and ENV10.

8.6 The Design and Access Statement demonstrates how the development of the Site will be integrated with the existing urban form and remaining countryside. The scheme will:

- Seek to reflect the character of the residential development to the south, opposite on Hall Road;
- Provide a landscape buffer and protect the character of Ironwell Lane;
- Provide a new and robust defensible boundary to the Green Belt;
- Provide a site for a new primary school, integrated with the development and existing community;
- Provide a range of open space for the enjoyment of residents;
- Protect and enhance biodiversity; and
- Maintain the character of the existing footpath.

Housing Needs and Mix

8.7 The parameters provide for 20 ha of developable land for residential purposes, which would enable the provision of a range of dwelling types. This equates to an average density of 30 dwellings per hectare. In addition, 35 % of dwellings will be made available on an affordable basis at a tenure and mix to be agreed with the Council.

8.8 Policy H2 (Affordable Housing) of the RSS East of England Plan states the following:

“Within the overall housing requirement in Policy H1, DPDs should set appropriate targets for affordable housing taking into account

- **The objectives of the RSS;**
- **Local assessments of affordable housing need, as part of strategic housing market assessments;**
- **The need where appropriate to set specific, separate targets for social rented and intermediate housing;**
- **Evidence of affordability pressures; and**
- **The Regional Housing Strategy.”**

At the regional level, delivery should be monitored against the target for some 35% of housing coming forward through planning permissions granted after publication of the RSS to be affordable.

- 8.9 Although Policy HP8 (Affordable Housing) of the Rochford Replacement Local Plan 2006 states a requirement of 15% this is superseded by the EEP and emerging Policy H4 (Affordable Housing) of the submission Core Strategy which sets a requirement at 35%.
- 8.10 The Thames Gateway South Essex Strategic Housing Market Assessment identified an acute need for affordable housing within Rochford District, equating to 131 net additional affordable dwellings per year. This amounts to 52% of Rochford’s annual target. However, it is important that viability is considered and the need to set a requirement that is economically viable. As such, 35%, being the indicative aim for the region (from the RSS policy above) is considered appropriate as a local requirement and the development as a whole will represent this figure.
- 8.11 The scheme aspect will provide a range of unit types and sizes. All dwellings will meet the criteria set out in the ‘Dwelling Space Standards Supplementary Planning Document – Consultation Draft’. They are also designed to meet Code for Sustainable Homes Level 4 (Code 3 for open market housing); Secured by Design standards and all affordable dwellings will meet the Housing Corporations Design and Quality Standards.

Suitability

- 8.12 The application is accompanied by a range of technical assessments, including Flood Risk Assessment, Transport Assessment, Agricultural Assessment, Arboricultural Impact Assessment, Archaeological Assessment, Ecological Assessment and Landscape and Visual Impact Assessment. They conclude that the Site is well located to the existing local services, free of technical constraints and can be effectively integrated with the existing urban form and remaining countryside.

Flood and Drainage

- 8.13 The Flood Risk Assessment states that following an inspection of the Environment Agency's website, the site is confirmed as being entirely within Flood Risk Zones 1, 2 and 3. It has been demonstrated that Environment Agency's flood maps definitions of Flood Risk Zones 2 and 3 within the site is inaccurate. The extent of Flood Risk Zones 2 and 3 has been redefined to a much smaller area to that shown on the Environment Agency's flood maps. All development proposals are therefore within Flood Risk Zone 1. The existing site is almost entirely surrounded by watercourses with no connection to the public sewers. A public foul water sewer runs along the eastern boundary of the site. A surface water drainage strategy has been prepared to demonstrate that the development proposals can be successfully implemented and designed to withstand the impact of a 1:100 year rainfall event (including climate change), in accordance with PPS25.
- 8.14 The development's surface water discharge rate will be limited to existing greenfield discharge rates with flow matching for the 1:1 year, 1:30 year and 1:100 year storm event including an allowance of 30% for climate change.
- 8.15 Anglian Water has been commissioned to undertake a foul water capacity appraisal due to concerns over the capacity of the downstream pumping station. Anglian Water has confirmed that the Rochford Sewage Treatment Works presently has capacity available to accommodate this development's foul water flows.
- 8.16 The report concludes that:
- 1) The development proposals are situated wholly within the flood risk zone 1 area;

- 2) The Development and its occupants are not at an increased risk of flooding;
- 3) The Development does not increase the risk of flooding elsewhere; and
- 4) The development can be drained in a sustainable manner;

8.17 The findings of the FRA identifies the opportunity to promote the sustainable re-use of existing resources and potential to implement an appropriate SUDS strategy with no detrimental effects to the flood risk status in the area. In this respect, it is recommended that planning permission be granted for this application in terms of flood risk and drainage matters. Should additional or detailed information be required it is anticipated that appropriate planning conditions will be recommended for future consideration.

Transport and Highway Improvements

8.18 The Transport Assessment concludes that the development would be accessed by means of two new priority T-junctions on Hall Road, with right turn lanes on the main road (requiring carriageway widening into the site). The eastern access will also be used to access the proposed primary school.

8.19 A foot/cycleway will be provided along the north side of Hall Road along the site frontage, and the section of Ironwell Lane to the west of the railway bridge along the site frontage will also be surfaced and lit to provide a second pedestrian and cycle route between the development and the town centre.

8.20 The Transport assessment demonstrates that the site is within walking distance of local services in Rochford town centre, of bus stops and Rochford railway station, with direct access to the London-bound platform from Hall Road. The site is therefore accessible by modes of travel other than the private car and hence is well suited for residential development in accordance with current national, regional and local planning policy guidance.

8.21 The Transport assessment has predicted weekday peak hour trip generation of the proposed development by each mode of travel. The expected increase in bus and train passengers is minimal and can be accommodated by existing services. The impact of the expected vehicle trips generated by the development on the operation of the local highway network has been considered for assessment years of 2017 and

2022, allowing for projected growth of background traffic. To ensure a robust assessment, the predicted traffic associated with both the committed developments, and the proposed developments which are currently the subject of ongoing planning appeals have also been included.

- 8.22 The proposed site accesses on Hall Road will have ample capacity to accommodate the predicted Development Case flows in both weekday peak hours in each of the two years. The Hall Road/Ashington Road/West Street mini roundabout could be signalised in order to minimise the impact of the development. This will also provide improved crossing facilities for pedestrians in the form of splitter islands on the Ashington Road and West Street arms. It is proposed to widen the Southend Road approach to the Bradley Way/South Street mini roundabout to alleviate the impact of the development and achieve 'nil detriment'.
- 8.23 The Cherry Orchard Way/Eastwoodbury Lane roundabout is proposed to have revised lane delineation on the Cherry Orchard Way approach to allow traffic to use either lane to turn right, as the left turn flows will be reduced further due by the diversion of Eastwoodbury Lane to accommodate the extension of the airport runway. This will more than offset the impact from the proposed development. It is proposed to widen the Eastwoodbury Lane and Nestuda Way approaches to the roundabout at the junction of these two roads with Comet Way to ensure that nil detriment as achieved at this junction.

Agriculture

- 8.24 The Agricultural Assessment demonstrates that, although leading to the loss of a large Grade 2 arable field, the land can be developed for housing led purposes without harm to the viability of the remaining farm.

Ecology

- 8.25 The Ecological Assessment confirms that the Site is generally of low intrinsic value from an ecological perspective, although the hedgerows, individual trees and pond are considered to be of greater ecological value within the context of the Site as a whole. The hedgerows and trees are to be retained and incorporated into the Development Proposals, whilst new wildlife habitat is to be created which will significantly increase the nature conservation value of the Site over its current value.

8.26 The Crouch and Roach Estuaries Site of Special Scientific Interest (SSSI) is approximately 2.2km to the east of the Site. The SSSI is also part of the Crouch and Roach Estuaries Special Protection Area / Ramsar site and the Essex Estuaries Special Areas of Conservation. The Ecology Assessment considered it highly unlikely that the Development Proposals would impact upon these statutorily designated sites, which are separated from the site by existing built form.

Archaeology

8.27 The Archaeology Assessment states the majority of the study area has been in agricultural use for many years and as such the disturbance of any archaeological remains present is likely to have arisen through ploughing.

8.28 Based on guidance given in PPG 16 (Planning and Archaeology), the developer in conjunction with Essex County Council is required to carry out further archaeological investigations prior to development. These are on going.

Arboriculture

8.29 The Arboricultural Impact Assessment concludes that during the construction build phase adequate provision is made for the protection of existing trees on site. This will include:

- 1) Tree protective fencing as shown on the tree protective plan.
- 2) That those parts of the tree protection zone (TPZ) that cannot be protected by fencing are protected using ground protection fit for purpose.
- 3) Design and implementation of new access roads and splay lines to take account of retained trees. This means minimal or no excavation within tree protection zones so finished levels need to take account of this.
- 4) The specific location of services where possible to avoid excavations within RPAs, or if necessary to be undertaken by supervised hand dig only.

- 8.30 The recommendations for foundation depth and design should be in accordance with NHBC 'Building near Trees', Chapter 4.2. It is advised that a copy of the report, including the site specific method statements and tree protection plan is kept on site at all times. Furthermore, the Appellants accept a condition will be imposed stating that there must be arboricultural supervision at critical stages.

Landscape

- 8.31 The Landscape and Visual Assessment concludes that the Site has an open character due to its existing land use. However the close proximity to local roads and existing residential areas to the south and east, as well as its robust boundary vegetation mean that it is well screened in local views and is well related and connected to the existing urban area.
- 8.32 Whilst development would inevitably change the existing character of the Site, it would have no material impact on the function of the Green Belt or the rural character of the surrounding landscape and the identity of Rochford. Residential development would include substantial structure planting along its boundaries and throughout a high quality streetscape. Once established, this planting would achieve an effective physical and visual screen. Along the western, northern and southern parts of the Site, usable open space is proposed and existing boundary vegetation would be strengthened and enhanced to reinforce the existing pattern of vegetation apparent throughout the Site and reinforce the contribution of the Site to its local landscape context. It is therefore considered that the proposed development would be absorbed and assimilated into the surrounding landscape and would have no material impact on views from surrounding areas including from within the green belt.
- 8.33 In conclusion, the proposed development is considered to be acceptable in landscape and visual terms and have no material landscape or adverse visual effects on the surrounding landscape including on the function of the Green belt.

Effective and Efficient Use of Land

- 8.34 The total application area is 33.45 ha. There is a need to provide for a defined boundary to the Green Belt and a buffer to Ironwell Lane. In addition, the Council seeks the provision of 1.1ha of land to accommodate a new primary school. As a result, the developable land amounts to some 24.95 ha. This will provide sufficient

land area to accommodate the proposed 600 dwellings and provide flexibility to provide a range of dwelling types and meet the Council's adopted standards.

Planning for Housing Objectives

- 8.35 The Council has identified the need to release Green Belt land to help meet the strategic housing requirements as set out in the EEP and maintain 5 year housing land supply. Rochford is identified as a Tier 1 settlement in the Core Strategy. Policy H2 identifies land to the west of Rochford as a strategic location for growth (600 dwellings). The application is consistent with the emerging Core Strategy and the Site Allocations DPD.
- 8.36 In addition, the scheme will accommodate a new primary school and will contribute to the continued development of Rochford.

Overview

- 8.37 This Bellway submission meets the objectives of Policy H2 of the CS Appendix H1 as delivering the following:
- New primary school.
 - Local highway capacity and infrastructure improvements.
 - Public transport infrastructure improvements and service enhancements.
 - Link and enhancements to local pedestrian / cycling and bridleway network.
 - Enhanced pedestrian access to town centre.
 - Hall Road Junction improvements.
 - Sustainable drainage systems.
 - Public open space.
 - Play space.

- Youth facilities and community facilities.
- Link to cycle network.

8.38 It is Bellway's submission that the scheme is consistent with the principles of development as set out in the emerging LDF (submission Core Strategy and Issues and Options Site Allocations) and the saved policies of the Local Plan and National Guidance, found in PPS3, PPS5, PPS9 and PPG13 in particular. The application satisfies the criteria set out at para 69 of PPS3.

9.0 SUMMARY AND CONCLUSIONS

- 9.1 This statement is submitted in support of the application by Bellway Homes Ltd in respect of land to the north of Hall Road, Rochford. The application is submitted in outline with all matters reserved except access. Permission is sought for 600 dwellings, together with a new primary school, and associated open space and landscape works.
- 9.2 The proposal addresses the requirements of Policy H2 of the emerging Core Strategy. The supporting technical assessments demonstrate that the Site is free from technical constraints and deliverable in the timescales outlined.
- 9.3 It is our position that the proposed development is wholly appropriate and in accordance with the provisions of the emerging Core Strategy.