

## **Rochford Core Strategy**

### **Statement in response to the Matters and Issues for the Resumed Examination, February 2011**

#### **Representations by Andrew Martin Associates on behalf of AW Squier Ltd**

##### **1) General**

##### **A) Given that the East of England Plan remains in place as part of the development plan, in what ways and to what extent would the proposed changes result in the Core Strategy failing to meet the requirement to be in general conformity with the East of England Plan, and are there any local circumstances that would justify any lack of conformity?**

The development plan includes the Regional Spatial Strategy (RSS) and Rochford District Council (RDC) needs to produce a document which is in conformity with the RSS and therefore they should have regard to the minimum housing targets contained within the RSS. As identified at paragraph 4.30 of PPS12 (Local Spatial Planning) "The core strategy should not repeat or reformulate national or regional policy."

The changes that RDC has made to the Core Strategy (CS) has resulted in housing delivery below that set out in the RSS and the targets and allocations are set out as maximums, which is not in conformity with either RSS or PPS3.

Our clients began with an allocation in an early draft of the CS of 300 dwellings at the East Ashingdon broad location. This has now been reduced to 100 dwellings, with the expectation of delivery of major infrastructure unchanged. There are no competing sites in the broad location and no environmental reasons why growth couldn't be 200 to 300 homes as originally envisaged, on a site with defendable Green Belt boundaries.

It is clear that there is a shortage of housing/house building in the UK, but it is also recognised that delivery in Rochford has been slow, with delivery of affordable housing almost non-existent. A larger allocation at the East Ashingdon broad location is not only sustainable but also can make a valuable contribution towards housing need.

There are no local circumstances to justify a lack of conformity with the RSS at the present time.

##### **B) What weight should be given to the Secretary of State's intention to abolish Regional Spatial Strategies, and what are the implications for the Inspector's consideration of the proposed changes?**

As things stand, little or no weight should be given to the Secretary of State's intention to abolish RSSs. The abolition of RSSs is a matter for Parliament. The Localism Bill deals with this; however, there is no set time table and no guarantee that the Bill will be passed for formal abolition nor any alternative advice from Government on their expectations for housing delivery.

Until the RSSs have been formally abolished, they form part of the development plan and therefore, policy at the local level (in this case the CS) should not be amended to reflect the anticipated changes to regional policy. The next version of the CS would take into account national and regional planning policy at that time and if the RSS has been abolished then the CS should be drafted accordingly.

##### **2) Location and Supply of New Homes**

**A) Would the revised CS meet the requirements of PPS3, having particular regard to paragraph 33 and paragraphs 52-61?**

Paragraph 33 of PPS3 relates to “assessing an appropriate level of housing” with the preceding paragraph stating:

“The level of housing provision should be determined taking a strategic, evidence-based approach that takes into account relevant local, sub-regional and national policies and strategies achieved through widespread collaboration with stakeholders”.

This has not been the case with the revised Core Strategy.

Paragraphs 52 to 61 of PPS 3 relate to “delivering a flexible supply of land for housing” with paragraph 52 recognising the importance of developing policies and implementation strategies to ensure sufficient, suitable land is available to achieve their housing delivery objectives. PPS3 also recognises the importance of “deliverable” sites and the need to maintain a flexible and responsive supply of land.

As set out in our response to question 2 E) below, we are concerned that there is no flexibility to ensure delivery in the event that one or more of the sites does not come forward and this is contrary to the requirements set out in PPS3.

**B) Is there sufficient justification for using the Option 1 Figures from the EoE Plan 2031?**

There is no justification for using Option 1 figures. Until the RSS is revoked or changed, it stands and the Adopted RSS figures should be those used in the Core Strategy.

**C) Would the revised CS comply with the requirement in PPG2 that Green Belt boundaries should be revised only in exceptional circumstances?**

In the case of Rochford, exceptional circumstances exist to amend Green Belt boundaries as the housing requirements for the District cannot be accommodated within the existing urban areas. Although priority has been given to urban sites, it has been necessary for the Council to allocate sites within the Green Belt and therefore the CS complies with the requirement in PPG2.

**D) To the extent that the revised CS allows for the potential release of Green Belt land to meet housing needs, is there sufficient clarity on when and how such land would be released, for example what would trigger the need to review the Green Belt boundary?**

Almost all of the allocations of any significance that have been identified in the Core Strategy are in the Green Belt. The precise land parcels will be identified through the Site Allocations DPD (SADPD) and this is likely to involve a Green Belt review. However, the Allocations DPD is some way from adoption and sites need to come forward before then to maintain the Council’s 5 year supply. The CS should recognise this and anticipate that some sites will need to be released from the Green Belt prior to the Allocations Document being adopted.

**E) Would the revised CS provide sufficient flexibility and a continuous supply of housing land?**

The CS as currently drafted lacks flexibility to ensure a continuous supply of housing land. The housing allocations are expressed as maximums and there are restraints on delivery (by the timings set out under policies H2 and H3). If an allocated site (or sites) fails to come forward (such as those identified at Stambridge Mills and on

existing industrial land) then the Plan does not provide an alternative to ensure that housing is delivered in accordance with expectations. It remains the case that delivery of residential development on industrial land presents many difficulties and constraints including moving tenants and occupiers to new industrial sites. RDC will need to demonstrate that this is achievable without job losses. There is scope within our client's land to the north of Brays Lane to include an Area of Special Restraint (ASR), which could be brought forward in the event that other sites fail to deliver.

### **3) Sustainability**

#### **A) Would the proposed changes have a positive or negative impact on sustainability, and would the revised CS strike the right balance between meeting development needs and environmental considerations?**

The changes will have a neutral/negligible impact on sustainability.

#### **4) Any other matters arising from the Proposed Changes.**

The changes set out in the Council's Schedule of Changes document cannot be incorporated into the Submission CS as they do not accord with current policy. The changes state that the RSS has been revoked, when in fact this is not now the case. As a result of the Cala Homes decision, the CS should be progressed in accordance with the current policy framework.

It is acknowledged that this is a period of uncertainty in planning as it is not known whether (or when) the RSSs will be revoked. However the CS should be progressed in accordance with the current policy framework and the CS should not be delayed as this will delay housing delivery.

In addition, it should be noted that the revised housing figures put forward by the Council in the Schedule of Changes are not supported by a robust and credible evidence base and may have negative impacts on the local population.

It is our view that the changes to the CS (extended end date of the plan, reduced annual targets and changes from minimum to maximum housing figures) reflect the Council's concern in relation to the delivery of some of their identified sites and broad locations set out in the Submission version of the CS. As set out above, the proposed changes do not accord with policy and should therefore not be incorporated into the CS. In order to ensure that housing requirements are met we consider that it would be more appropriate to identify reserve land to be brought forward in the event of a shortfall (such as at the East Ashingdon broad location) which will provide greater flexibility and certainty to ensure that targets are met, whilst complying with the current national and regional policy.