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Ms Lissa Higby
Programme Officer
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25th June 2010
By email and post

Dear Ms Higby

Response to Rochford LDF Core Strategy General Housing Locations – Audit Trail

As you will be aware, WGDP Ltd recently participated on behalf of **Mr & Mrs Poole at the Core Strategy Examination on Matter 2: Location and Supply of New Homes.**

We note that the Council's Audit Trail in support of the General Housing Locations identified in the Submission version of the Core Strategy has now been made available. We have reviewed this document, and we summarise below our comments for consideration by the Inspector.

We maintained in our Hearing Statement, and also at the Examination, that the dwelling distribution across the District was *mismatched* with the size and role of each settlement and that this would lead to an unbalanced distribution of housing growth that will fail to promote the most sustainable patterns of development over the Plan period. This was particularly evident in the case of Rayleigh, which is the largest Tier 1 settlement, comprising half the population. Whilst it is proposed that the RSS housing numbers will shortly be abolished, we still maintain that this criticism of the Core Strategy is a valid consideration.

The Council's Audit Trail makes it clear from the outset of the production of the Core Strategy the pre-eminent role that should be given to Rayleigh, and it notes as a probable scenario that 90% of the total number of housing units should be allocated to the top settlements, and 10% to the second tier settlements to gain a small number of large sites which will deliver the greatest amount of infrastructure improvements. Accordingly, the Preferred Options version of the Core Strategy identified the proposed split, with Rayleigh taking approximately 1,800 new dwellings over the Plan period.

Whilst we acknowledge that concern was expressed by Members of the Committee (page 9) at the large figure for Rayleigh, the Audit Trail confirms that ***"it was clear that Rayleigh had a good road network that connected to South Essex. Conversely, Hockley and Hawkwell were badly located in terms of road networks, with the exception of the southern part of Hockley. Rochford and Ashingdon contained important environmental designations and the eastern section was not well located in terms of the district's road network. In addition, Ashingdon Road was the busiest road in the District"***.



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The Sustainability Audit that was undertaken alongside the Preferred Options also supported the concentration of housing provision at the larger settlements. However, consultation responses to the Preferred Options expressed concern over the quantum of new development for Rayleigh due to the capacity of existing schools to accommodate 1,800 new dwellings. However, it was confirmed that half of the requirement could be met by expanding existing schools, and that a new single form entry primary school would be needed to support London Road, but Fitzwirmarc and Sweyne Park could undergo limited expansion.

A Revised Preferred Options was published and the Council advised that a **"slight change in the balance was considered appropriate, in particular that a reduction in numbers for Rayleigh and an increase in Hockley would fit better with current schools capacity and concerns about facilities being sustained in the lower tier settlements"**. However, this is cited as the only reason for a shift in the direction, and redistribution of the housing growth, which does not follow the conclusions of the Sustainability Audit that housing provision should be concentrated at the larger settlements i.e. Rayleigh. It also ignores the earlier comments raised over the inadequacy of the road network and environmental designations in the other settlements which prevented them from accommodating a higher level of housing growth.

The Audit Trail notes that there was an LDF Sub-Committee held on 23rd September 2008 and also on 23rd September 2009. However, the document fails to explain how the Council arrived at the redistribution of housing development, which sought to **"constitute a balance between focussing development on the higher tier settlements, whilst allocating a proportion of the housing development to the lower tier settlements, to ensure those established communities can be sustained and that rural services continue to be supported"**.

Although the SHLAA process is outlined, the Audit Trail fails to justify the identification of the four employment sites that are included in the Submission version of the Core Strategy, other than to argue that it will lead to a reduction in the number of proposed dwellings to be developed on land allocated as Green Belt. There does not appear to have been any proper site assessment to confirm that the sites are **suitable, achieve and deliverable**. This is a significant flaw.

We know from our presence at the Examination, that occupiers of the Rawreth Industrial Estate were in fact unaware that the estate had been included as a preferred location for housing development in the Core Strategy; and the redevelopment of Stambridge Mills is also unsupported by the Environment Agency, given the absence of an up to date SFRA. The Audit Trail does not clarify why these locations were selected in favour of alternative housing sites. Moreover, it does not consider whether they are viable options.

Having reviewed the Audit Trail, we would conclude as follows:

1. An assessment of alternative housing growth scenarios was explored at the initial stages of preparing the Core Strategy, which involved directing the greatest proportion of growth towards Rayleigh. This option was later rejected in favour of redistributing housing growth to less sustainable lower tier settlements, owing to the limited capacity of existing schools in Rayleigh, which would have to undergo some expansion to accommodate new pupils.

2. The Audit Trail does not provide any comparative assessment of alternative strategic sites against the general locations chosen. Whilst the Core Strategy process has been subject to a Sustainability Appraisal, the evaluation exercise that was undertaken by the Council still remains unclear.
3. The Audit Trail does not exclude Rayleigh on the grounds of environmental capacity. It is clear from the SHLAA and Core Strategy Examination that there are a number of smaller sites on the edge of Rayleigh that would be more appropriate for the Authority to bring forward, for example, Lime House Nursery Industrial Park. The concentration of housing growth in Rayleigh would offer a much better fit – as well as providing a more balanced strategy in accordance with the settlement hierarchy.
4. We maintain our original concerns that the General Housing Locations in the Core Strategy – as submitted – cannot be justified by the Audit Trail. We do not consider the evidence base to be sufficiently robust or transparent to support the Council's strategy when considered against the reasonable alternatives that were highlighted to the Inspector at the Examination, and in short, we therefore find the Core Strategy **unsound**.

We would be grateful if you would pass our comments onto the Inspector, as requested – and would you also kindly note that we would be pleased to attend a further session on the Housing Audit Trail, should the Inspector decide to hold one.

We would be grateful if you would keep Fiona Jury and Mike Washbourne of this practice fully informed. If you have any queries, let us know.

Yours faithfully,


WGDP Limited

Cc Mr & Mrs Poole