

Core Strategy General Locations – Audit Trail

Response by Andrew Martin Associates on behalf of AW Squier Ltd, The Croll Group, Humphrey Squier, Daniel Squier and Jeremy Squier.

General Comments

The Council's Audit trail provides a useful summary of the stages that it has gone through in determining the general housing locations that are contained within the Submission version of the Core Strategy (CS). Whilst we believe that there have been some flaws in the Council's approach, we do not consider that they are sufficient to render the CS unsound.

Given that the Council knew that there was likely to be a need to find housing land from outside the urban areas, we consider that the most appropriate approach would have been to undertake a Green Belt Review to assess sites on the edge of existing settlements. Such an approach has been undertaken in other authorities and areas such as Castle Point, East Herts, Broxbourne and Cambridge. Ideally this should have been undertaken at an early stage in the Plan making process.

The Council's approach to identifying the number of dwellings to be provided on the edge of each settlement took account of two factors. Firstly, the populations of the settlements and the distribution of the population between those settlements, and secondly, the environmental capacity of the settlements, their connectivity and their sustainability. Whilst these are important criteria, any assessment should have equal regard as to whether these settlements contain sites or broad locations that will be capable of delivering housing in a sustainable manner.

Whilst it is not disputed that the Council had an extensive evidence base (as documented in Table 1), the evidence which assesses and identifies the broad locations themselves, in particular, their capability of delivery appears to be lacking. A review of all key locations on the edge of the main settlements against key criteria would have established the most appropriate broad locations where delivery is realistic in the time frame, as well as highlighting why other sites should be ruled out.

Although this analysis was not undertaken at the early stages of the plan making process, the locations for housing were given serious consideration by Officers and Members, subjected to public consultation and assessed by a Sustainability Appraisal at each stage. For example, the consultation response from Essex County Council in relation to primary school places resulted in a change to the distribution at the Revised Preferred Options stage, where the allocation for Rayleigh was reduced by 300 dwellings and increased in Hockley by the same number.

The Strategic Housing Land Availability Assessment (2009) is a key assessment which provided a more comprehensive assessment of opportunities to accommodate dwellings in the District. Whilst it would have been useful to have undertaken an assessment of this nature earlier in the process, it still had value as it enabled more detailed scrutiny of sites and resulted in further consideration by Members of alternative sites and also some amendments to the strategy.

Although we consider that a fully robust assessment of the quantum identified for each settlement was lacking from the early stages of the process, we do consider that subsequent stages of the process have provided the opportunity to revise the strategy as necessary as further detail became available through the various stages of consultation and production of the evidence base (namely the SHLAA).

Given the nature of the assessment undertaken and inherent uncertainties with the housing land supply coming forward, it is important that the CS retains its flexibility in terms of the quantum of development at the broad locations. This will enable more dwellings to come forward if needed where this can be supported by the evidence contained within the SHLAA, since many of the broad locations identified, contain sites which have been identified as having greater capacities than their respective Core Strategy allocations. Furthermore, some doubt remains in relation to some of the broad locations in relation to their timely delivery, particularly those involving former industrial land. Flexibility will allow some locations to take development in the event of other locations being delayed or not coming forward at all.

Specific Matters in relation to Audit Trail

Page 1 – Passed trends in highway usage in the District showed that more traffic went between Hockley to east Southend, via Sutton Road, than passed through Rochford via the A127, there does not appear to be any evidence which has emerged to demonstrate this has changed.

Page 5 - It is stated that the Issues and Options called for a minor extension to Hullbridge amongst others; however, the Submission document proposes 500 units in the plan period for Hullbridge, hardly minor.

Page 16 – The landscape assessment suggest that East Rochford/Ashingdon and north of Ashingdon are more vulnerable to landscape harm than other parts of Rochford or Ashingdon. There is no mention of the landscape character of the very open land west of Rochford on which the Council suggest a development of 600 units.

Page 19 - deals with Agricultural Land Classification summarising the evidence base, its findings can be described as vague. The broad locations could have been accurately plotted, which would reveal that one of the key broad locations, West Rochford, is in fact on Grade 1 agricultural land, which is inconsistent with Government advice.

Page 21 – Reference is made to Canewdon as relating well to Southend in relation to avoiding the generation of traffic on the local road network. It is not possible to get to Southend from Canewdon, without using Ashingdon Road or passing through Rochford and therefore this statement is not justified.

Specific Matters in relation to correspondence between ECC and RDC

Pages 2 and 3 – The audit suggests that proposals for Ashingdon were seen as potentially having a highways impact in relation to the town centre the junction of Brays Lane and Ashingdon Road. However, this appears to be inconsistent as on page 3 it is stated that ECC considered there was no issue in terms of locations East of Ashingdon and the 100 dwellings. The audit does not identify whether more development East of Ashingdon was equally satisfactory from a highway perspective.