



**Councillor John Mason**

**Representing the Hawkwell West Ward**

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**Member Correspondence**

Date: 26 June 2010

Miss Laura Graham BSc MA MRTPI  
Planning Inspector  
C/O Programme Office  
RDC

Dear Miss Graham

I have read the additional information provided by the Council at your request and which was posted on the Council's Web Site on 12 June 2010.

I was hoping that this would answer some of the questions, issues and challenges that I raised and you noted on 12 May 2010.

I am afraid that for my part the additional information does not assist me in that respect.

You have invited comments from Respondents who attended the PE Hearings on the additional information you requested from the Council by 17.00 hrs on 28 June 2010. This letter sent by email to your Programme Office at RDC complies with that requirement.

I have looked through the Audit Trail and I cannot find a trail to the actual evidence that the Council has undertaken a comprehensive and detailed (in planning terms) comparative assessment of the impact of the CS Locations, in that they are identified for places of housing growth, in terms of the impact on green belt, the effect on the landscape and highways.

I raised with you on 12 May, at the first day of your Hearing on Housing, my concerns about the lack of a comprehensive assessment in highway impact in terms of ALL of the proposed developments on the entire highway network by cumulative effect. Neither does the additional information provided by the Council specifically on Transportation provide this necessary evidence.

Also of great significance I cannot locate in the Audit Trail a detailed consideration of the impact and harm of ALL the development sites on the Hockley Woods SSSI.

I also raised with you my opinion of the unsustainability of South Hawkwell in particular and spoke about the consideration of alternative Locations.

It seems to me having looked through the Audit Trail as a definitive source of additional information to the Public Examination of the CS that there is no actual evidence that the Council has undertaken a detailed objective assessment, in planning terms, of reasonable alternatives to the Locations which have been put forward in the CS.

Indeed prior to identifying the Locations to the public at all the Council should have carried out an assessment of reasonable alternative Locations that was conducted in full, in a detailed and objective manner in planning terms and, above all, visibly to the public.

In my view SOUNDNESS of the CS may have been compromised and that these are substantive objections to the CS and, therefore, it should not be recommended for adoption following the PE as it is UNSOUND.

Indeed according to the Blyth Case I believe that no weight can be attributed to an emerging core strategy in the light of substantive objections?

If you not minded to observe that it is UNSOUND then the emerging CS will continue to be presented in planning applications which are premature in terms of PPS3.

What is of great concern to me is that in a letter of objection dated 16 June 2010 submitted to the Council in respect of the Hall Road Planning Application (10/00234/OUT), Colonnade Land LLP allege that in evidence to the Coombes Farm Appeal that the [RDC] Planning Policy Team Leader confirmed that the Council could not resist applications for residential development at the broad locations in the CS.

I would urge you to find this CS UNSOUND and allow the substantive objections to require that the emerging CS is revised by the Council and, in any event, probably replaced by a fresh local plan in accordance with the written intentions of the new Government as put forward by Secretary of State, Eric Pickles in his letter dated 27 May 2010.

There is a final matter that I wish to draw to your attention.

There would appear to be gap in the Audit Trail between the LDF Sub Committee Meetings which are referred to on 9 February 2009 and 1 July 2009. The Reference points are Pages 36 and 37.

There was a meeting of the LDF Sub Committee which is not reported upon and for the sake of completeness I am informing you accordingly because it was a significant decision making occasion.

As a Member of the Council I was invited by an Officer by email only to attend a meeting of the LDF Sub Committee on 1 April 2009 where all Members could attend to discuss the Allocation of Sites.

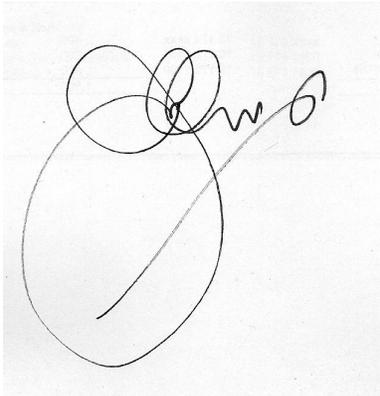
It was a meeting where Minutes were NOT published to my knowledge with just Shaun Scrutton attending other than Members.

It was not summonsed by a Council Agenda or advertised to the public that a meeting was to be held by the LDF Sub Committee on the Allocation of Sites.

This part of the CS process should have been made visible to the public with a record of the explanations for the basis of the assessment undertaken and the detailed planning reasons for promotion or rejection of sites disclosed when the Allocations of Sites DPD was put to public consultation in March 2010.

There were some reasons given in the Allocation of Sites DPD but the quality of these is very poor in my opinion and I have concern that the Council has not undertaken a comprehensive and detailed (in planning terms) comparative assessment of all of the sites promoted and rejected by the Council.

Sincerely

A handwritten signature in black ink on a light-colored background. The signature is highly stylized and cursive, starting with a large loop on the left and ending with a small flourish on the right. It is positioned above the name of the signatory.

**Councillor John Mason BSc FLS ACIB**