



Programme Officer
Lissa Higsby
Council Offices
South Street
Rochford
Essex
SS4 1BW

Our Ref: KLV/07/145

Date: 25th June 2010

Dear Ms Higsby

REF: ROCHFORD CORE STRATEGY EXAMINATION – CORE STRATEGY GENERAL HOUSING LOCATIONS AUDIT TRAIL

We represent Barratt Eastern Counties who have submitted representations referenced 16915 to 16928 and who have a land interest in the area known as south Hawkwell. We have reviewed the Audit Trail and accompanying documents and submit our response below.

General Points

1. Our understanding was that part of the purpose of the audit trail was to provide evidence of the options identified and choices made by Rochford DC when preparing its housing strategy in regard to extensions to residential envelopes as expressed by Policy H2 and H3. I have reviewed the Audit Trail document and the links provided but cannot find any robust evidence as to why certain housing locations were chosen and others were not. I find that some housing locations appear less than satisfactory choices than other housing locations that could have been chosen. I also find that of the suitable sites more housing could be targeted at these than some of the less suitable identified sites.
2. I note the description of the process that Rochford DC have gone through in preparing the Issues and Options documentation, the sustainability appraisals and Preferred and Revised Preferred Options. I also note Table 1 at page 15 of the report which appears to provide a sifting analysis and which ultimately led to the 'District Characteristics and Key Diagram' Plan which accompanies the

Audit Trail and purports to justify the housing locations. However, on closer inspection I find that Table 1 and the Districts Characteristics Plan reveal no analysis to justify why the housing locations identified in the Submission Core Strategy were chosen as opposed to other alternate locations of equal merit elsewhere or why they chose certain minimum housing numbers. I note the criteria at paragraph 4.19 which could and should be used to identify appropriate Green Belt sites but I have doubts that there is any evidence to suggest that the local authority has adequately carried out this task. I explain my concerns in more detail below.

Green Belt Assessment

3. Table 1 of the Audit Trail report identifies a number of documents which purport to explain why choices were made. These include SEA baseline information profile, (covering ecology) landscape character assessment, ancient woodland, air quality, flooding, soils, population, employment land, traffic, retail and leisure, urban capacity, Essex School Plan, EEP 2008, Conservation Areas Appraisal, call for sites, Green Grid, Hockley Parish Plan, and Rawreth Parish Plan. Conspicuous by its absence is a review and explanation of the choices made for housing locations in the Green Belt. The Green Belt, being probably one of the most important designations in the District, should have been specifically assessed as regards an evidential report.
4. Whilst it is clear that there is no paper trail to justify the options chosen for any of the housing locations, it is my client's view that the Inspector will need to consider locational issues in the round and recommend changes to ensure soundness. This will undoubtedly mean the Inspector having to judge the general housing locations against PPG2 (whether they comply with National Guidance) and deciding which should remain. I find that a more appropriate and sound process would have been to identify potential Green Belt sites following the sift analysis, specifically assess these and to explain why certain locations are suitable and have been chosen.

Choices Between Sites

5. The Audit Trail does not provide any assessment of the choices made between sites. There is no report that identifies all the potential Green Belt sites following the sifting analysis. For example when identifying sites around Rochford and Ashingdon I would have expected to have found an assessment of why sites east of Rochford in the area promoted by the Coombe Farm landowner (Iceni Projects) was discounted in favour of a site on the western side of Rochford (Bellway Homes). Both are in the Green Belt but one was chosen over the other. I find that the Coombe Farm site is in a location that would not lead to coalescence between settlements whereas the west of Rochford site along Ironwell Lane would. The respondents promoting the west of Rochford site, Bellway Homes, helpfully identify the site by reference to a red line plan in their submissions. This clearly demonstrates that the site would occupy open land

between Southend and other Rochford settlements. I attach to this letter at Appendix 1 an extract from the Local Plan 1988. On page 15 of the 1988 Local Plan, paragraph 3.32 explains that the purpose of Green Belt in the area was to prevent the Northward expansion of Southend on Sea, to prevent the coalescence of settlements within Rochford with Southend on Sea and to prevent the coalescence of towns and villages within Rochford. Clearly an Audit Trail should explain why West of Rochford was chosen as an option despite it occupying open land between Southend and settlements within Rochford. In my view the West of Rochford area would lead to coalescence, would have significant landscape impacts and would encourage the growth of the town along Ironwell Lane. It shouldn't be identified. To make the Plan sound I would recommend that South Hawkwell revert to 330 or 400 dwellings as noted in previous versions of the Core Strategy. Such an approach would be legitimate as these dwelling numbers have already been the subject of local consultations.

South Hawkwell

6. The area identified as south Hawkwell also does not appear to have been assessed by Rochford DC or any justification provided why it is a suitable area for new housing. Barratt Eastern Counties have a landed interest on a site within this general housing area (see attached plan at Appendix 3). This area is suitable as a housing location because there are parts within it which are urban fringe locations and which comprise urban fringe uses including paddocks, a Christmas tree plantation, redundant and derelict nursery's and some lawful commercial uses. The removal of these uses for new housing would not offend Green Belt purposes.
7. Within the south Hawkwell general area there is an open area of land between housing to the west of Thorpe Road and housing off Sweyne Avenue to the east. In this context the development of the area that has historically been used as a nursery and plantation and is well contained by defensible boundaries would not offend significantly harm the wider Green Belt. I consider that Rectory Road could form an important defensible boundary in view of the development either side of this area and that this complies with PPG2, paragraph 2.6 to 2.10.
8. I consider that the presence of development either side of the area generates a particular built up and enclosed character which supports the retention of south Hawkwell in the Core Strategy as opposed to other sites such as West Rochford or Stambridge Mills. Within parts of the area, views out are limited either by existing built development at the perimeter or by the thick vegetation to the north (including the woodland trees). Rectory Road has a distinctly urban character in the vicinity of Sweyne Avenue with housing either side of Rectory Road at this point and this helps create a well defined future Green Belt boundary. Whilst the area in the vicinity of the 'Old Rectory' and areas south of Rectory Road are more rural and open in character and would not constitute a suitable location for housing within the 'south Hawkwell' Core Strategy area. To the west in the vicinity of Thorpe Road the urban character returns with housing to the north and south of

Rectory Road around the junction with Hall Road and Main Road. Since the settlement of Hawkwell includes development either side of a large open area the logical infilling that would flow from development at 'south Hawkwell' would be appropriate.

9. In the absence of an assessment by Rochford District into the options and choices for the housing locations, it is important that this letter is noted as evidence to the Examination on behalf of Barrat Eastern Counties. I provide at Appendix 2 a summary of the suitability of the area south of Hawkwell to provide housing. If the Inspector concurs that west of Rochford should be deleted and other sites such as Stambridge Mills should also be deleted (evidence was heard specifically on this in relation to Flooding) then the south Hawkwell location should be altered to accept more housing as was promoted at Preferred Options stage (400 dwellings) and as promoted in the representations by Barratt Eastern Counties.

Yours sincerely

A handwritten signature in black ink, appearing to read 'M Hull', written over the typed name.

Martin Hull MRTPI

Kember Loudon Williams Ltd

APPENDIX 1

EXTRACTS OF 1988 LOCAL PLAN

CHAPTER 3

3.0.0 THE GREEN BELT

3.1.0 Introduction

3.1.1 In the original Essex County Development Plan, the Metropolitan Green Belt only extended as far east from London as Basildon and Billericay. It was provisionally extended in 1961 to cover all but the easternmost part of Rochford District, because the Green belt was not extensive enough to control development pressures arising from its accessibility to the Capital.

3.1.2 The Approved Review of the Development Plan (1976) accepted the desirability of applying Green Belt policies to the whole of the extended area, pending further study of the extension, and the extended area in South Essex was finally confirmed as Metropolitan Green Belt in the Approved Essex Structure Plan (1982) following considerable pressure from Rochford District Council and the County Council at the Examination in Public and subsequently.

3.1.3 The Rochford District has therefore experienced the application of Green Belt policy within most of its area for almost 25 years, and it has generally been very effective. It is thought by many that the Green Belt has been one of the most successful planning concepts probably because its simplicity enables it to be easily understood.

3.1.4 In October 1985, the London and South East Regional Planning Conference (SERPLAN) issued a Regional Statement entitled "South East England in the 1990's" and submitted it to the Secretary of State as a suggested basis on which the Minister could issue updated regional strategic guidance to replace that issued in 1980.

3.1.5 The approach adopted in the Statement for the physical and economic growth and regeneration of the Region does not merely allow conservation of Green Belt and other parts of the countryside, it requires it as an essential part of the overall interdependent strategy. Whilst areas east of London are recognised as those where growth needs to be encouraged, it is stated that there should be no undue loss of countryside to new development.

3.1.6 The Statement intends that the Metropolitan Green Belt should remain a crucial element in the regional structure, being of vital importance in a densely populated region's pattern of town and countryside. It also considers that the Green Belt must continue to receive firm support from Government and at local level, with its precise limits being defined locally through the development planning system, creating some development feasibility and producing sensible and defensible boundaries.

3.2.0 Strategy

3.2.1 The basic objectives of establishing a Green Belt were set out in Ministry of Housing and Local Government Circular 42/55. Department of the Environment Circular 14/84 reaffirms these objectives (and the related development control policies) and these are as follows:-

- (a) To check the further growth of a large built up area;
- (b) To prevent neighbouring towns from merging into one another; or
- (c) To preserve the special character of a town.

3.2.2 The overall strategy for Rochford District in applying these basic Green Belt principles will therefore be as follows:-

- (i) To prevent the northward expansion of the Borough of Southend-on-Sea. (It is expected that the Southend Local Plan will in fact extend the Green Belt into parts of the Borough for the first time).
- (ii) To prevent the coalescence of the settlements within Rochford District with Southend.
- (iii) To prevent the coalescence of the towns and villages within Rochford District.

3.2.3 The application of the basic Green Belt principles through the strategy identified above will have the dual effect of preventing the random encroachment of development into the countryside and of safeguarding the countryside to provide for recreational needs and the protection of natural features, flora, fauna and their habitats.

3.3.0 Definition of Green Belt Boundaries

3.3.1 The Essex Structure Plan states that, "the problem of containing the spread of major urban areas is not confined to resisting the outward sprawl of London, and the rapid development of residential areas surrounding Southend was one of the main reasons for previously extending the Metropolitan Green Belt eastwards to prevent the coalescence of Hawkwell, Hockley, Rayleigh, Thundersley,

Benfleet, Hadleigh and Southend. This area has been subject to considerable development pressures in the past, and this will undoubtedly continue in future. These places must continue to remain separate to prevent the coalescence of all developed areas in South Essex with each other and with London".

3.3.2 As such, the general extent of the outer Green Belt boundary as it affects Rochford District is described in Essex Structure Plan Policy S6 which is as follows:-

"... the outer boundary should ... gird the west and south sides of that town (Chelmsford) to reach the approximate line of the A130 road, along which it should run to the vicinity of Rettendon/Battlesbridge before turning eastwards along the south bank of the River Crouch to the confluence with the River Roach. The boundary should then run west of Foulness Island to meet the Thames Estuary, and thence westwards excluding existing built-up areas, as far as the County boundary with Greater London"

3.3.3 The extent of the outer boundary is shown on the accompanying Proposals Maps A and B, and it will be noted that excluded from the Green Belt at the eastern end of the District, in addition to Foulness, are Havengore and New England islands which are now physically joined to Foulness. The boundary therefore follows the Middieway between the Roach and the Thames, thus giving a well defined physical boundary.

3.3.4 As far as the inner boundaries around towns and villages are concerned, which are depicted on Proposals Maps A, B and Town centre Inset Map E, the Secretary of State, in his letter dated 30th March 1962 approving the Essex Structure Plan, stated that he did not consider that a Green belt should be used to give temporary protection to land which may be required for development after 1990, and he accordingly modified Policy S7 as follows:-

"... The boundaries around towns and villages will be defined by reference to the foreseen long term expansion of their built-up areas acceptable in the context of the stated purposes of the Green Belt and of the provisions for development specified in Part III of the plan".

3.3.5 The inner Green Belt boundaries shown on Proposals Maps A and B and Inset Map E allow, therefore, for the proposals in Part III of the Essex Structure Plan as modified by Local Plan Policy H2. In addition, certain other areas are excluded from the Green Belt and shown as areas of special restraint, these having been arrived at following a critical examination of a defensible inner Green Belt boundary and are intended to provide for long-term post 1991 development needs of the District. (See Chapter 2, Policy H8).

3.4.0 **Development within the Green Belt**

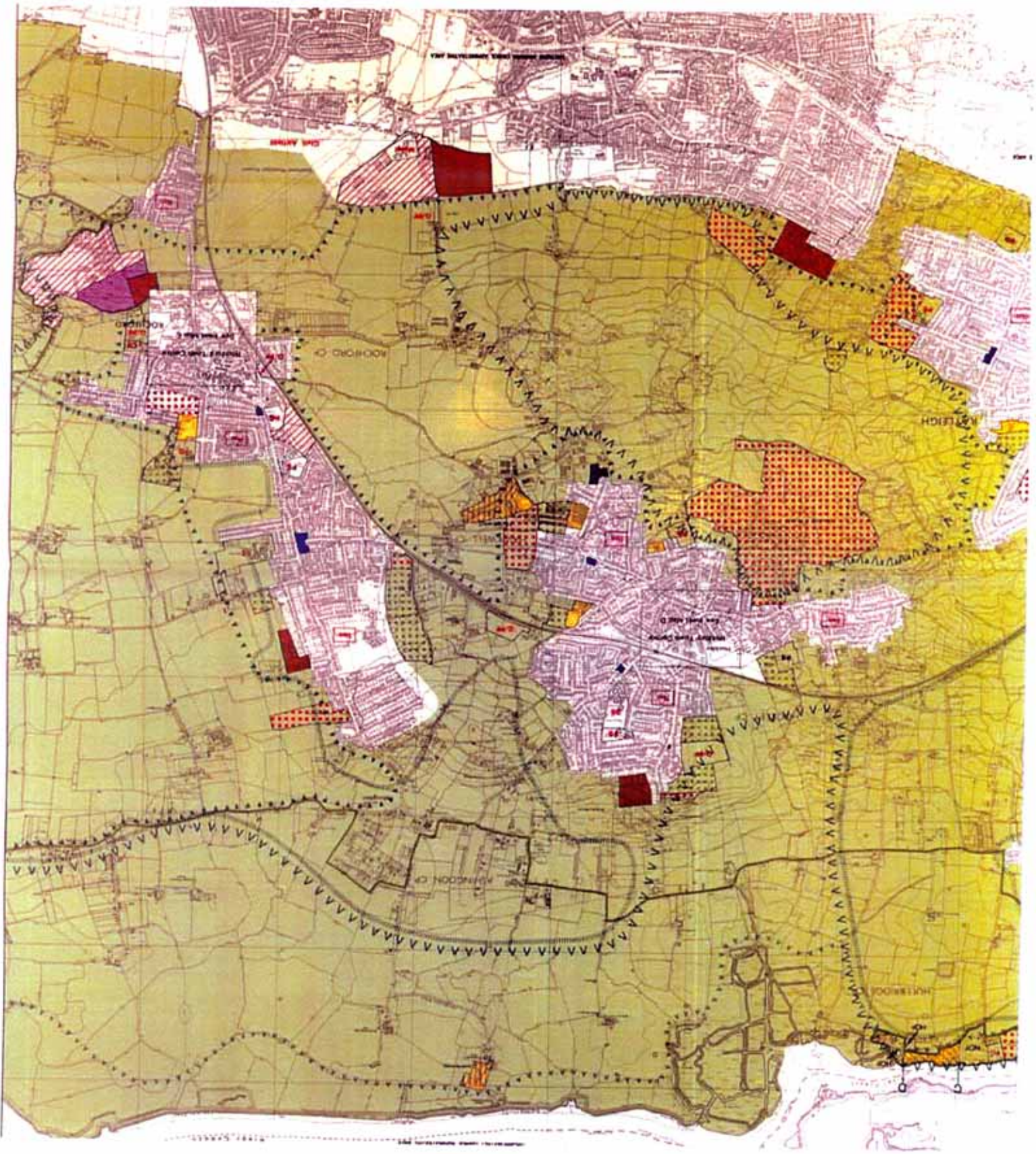
3.4.1 In order to maintain the objectives of Green Belt policy it is essential that future development proposals continue to be strictly controlled.

3.4.2 The effect of applying the 3 prime objectives identified in paragraph 3.2.1 is to limit the number of people living and working within the Green Belt and thereby contain the amount of general activity and the demand for additional employment, social, educational and public utility services which not only lead to further erosion of the countryside, but are also more costly to provide in rural locations.

3.4.3 The District Council will be sympathetic to the requirements of the Public Utility Services, particularly in relation to the maintenance and improvement of existing services or to the provision of new services or undertakings, provided that these requirements do not conflict with the prime objective of controlling development within the Green Belt.

3.4.4 The Essex Structure plan reaffirms the need for the strict control of development within the Green Belt in Policy S9, and the District Council would wish to reiterate this as follows:-

POLICY GB1 WITHIN THE GREEN BELT PERMISSION WILL NOT BE GIVEN, EXCEPT IN VERY SPECIAL CIRCUMSTANCES, FOR THE CONSTRUCTION OF NEW BUILDINGS OR FOR THE CHANGE OF USE OR EXTENSION OF EXISTING BUILDINGS (OTHER THAN REASONABLE EXTENSIONS TO EXISTING DWELLINGS AS DEFINED IN POLICIES GB2 and GB6), OR FOR PURPOSES OTHER THAN AGRICULTURE, MINERAL EXTRACTION OR FORESTRY. SMALL-SCALE FACILITIES FOR OUTDOOR PARTICIPATORY SPORT AND RECREATION, INSTITUTIONS IN LARGE GROUNDS, CEMETERIES OR SIMILAR USES WHICH ARE OPEN IN CHARACTER. DWELLINGS FOR AGRICULTURAL WORKERS MAY BE PERMITTED IN CONJUNCTION WITH FARMS IF IT CAN BE SHOWN THAT THE WORKER MUST BE RESIDENT ON THE AGRICULTURAL HOLDING (SEE POLICY GB3). PERMISSION MAY BE GRANTED FOR THE CHANGE OF USE OF REDUNDANT FARM BUILDINGS LISTED AS BEING OF SPECIAL



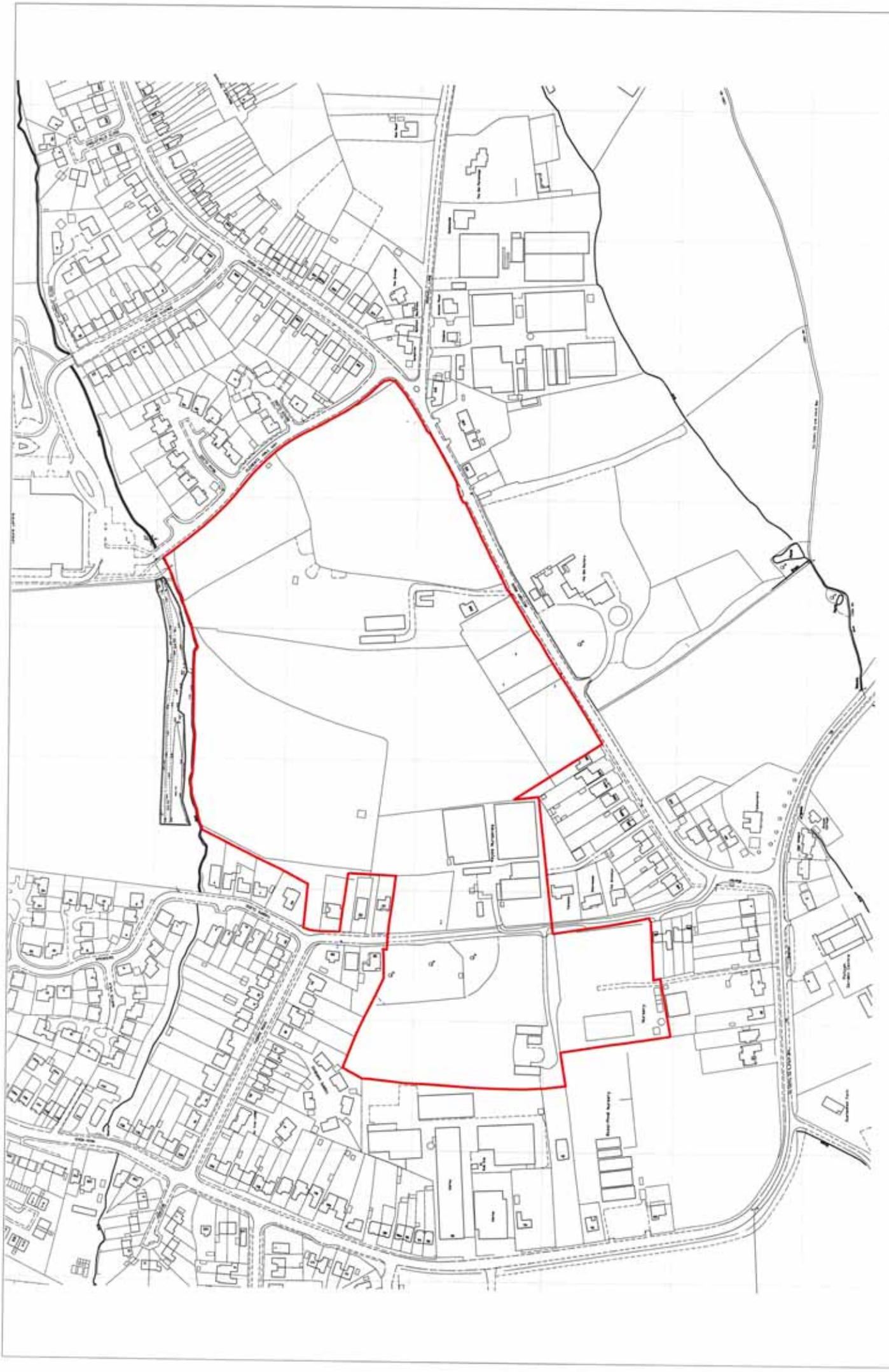
SUMMARY OF SUITABILITY OF LAND SOUTH HAWKWELL

- The ability to develop land north of Rectory Road, within the south Hawkwell location, would mean that a new and defensible Green Belt boundary could be created. Such a housing location would not lead to the coalescence of Southend with the co-joined settlement of Hockley/Hawkwell.
- The capacity of south Hawkwell to accept housing has at preferred options stage been 400 dwellings. As part of the appeal (see Barratt Eastern County submissions) one particular site in south Hawkwell able to accommodate up to 330 housing units.
- The south Hawkwell location is on a proposed strategic cycle network as identified on the SCS Proposals Map 2009. There is a bridleway to the north. The location will be able to deliver a sustainable access strategy.
- The south Hawkwell location can be accessed off Rectory Road. This would mean that the location is able to fully connect into the existing road network with limited highway works. The junction between Rectory Road and Main Road will need to be enhanced by means of an extra turn left lane, however, the requirements are relatively modest.
- There are 4 bus stops along Rectory Road. Those along Rectory Road are operated by Arriva and include the No 7 and 8, which link to Southend and Hockley railway station and its Town Centre. The south Hawkwell location is therefore suitably located for public transport and this accords with saved Policy TP5 of the Adopted RRLP 2006.
- Hockley benefits from a mainline railway station with regular services to Southend and London beyond.
- The location is not the subject of any District wide landscape quality designations. Whilst there is a woodland Tree Preservation Order in this general housing location any development can avoid it and potentially enhance the management of it. Most of the area is flat, with horticultural buildings and other sporadic uses.
- The location is not subject to any National or Local ecological designations that would deter its future development.
- In some areas of this south Hawkwell general location there are redundant plant nursery's, Christmas Tree plantation, equestrian uses and lawful inappropriate development. Removal from the Green Belt would not necessarily undermine the Green Belt significantly in this area.
- There are some locations in the area termed south Hawkwell which lay adjacent to Spencers Park public open space and are a short walk from Rochford District's main Leisure Centre at Clement Hall Way and associated playing fields.
- The general housing of south Hawkwell is within walking distance (500m) of the local shops on Main Road, local schools and health facilities.
- There are two primary schools and a secondary school within Hockley/Hawkwell. Although the schools in this area are confirmed to have spare capacity, the Primary School off Sunny Road is accessible to the south Hawkwell area by walking.
- The location is within 1km of the Town Centre and Eldon Way main employment area which are accessible by bus and a small industrial estate off Main Road towards the south of Hockley/Hawkwell.

- This location would be able to connect into the Cherry Orchard Way link road to the A127 and the main employment site currently being developed by Twomey Group to the south.

APPENDIX 3

SITE PLAN – AREA 'SOUTH HAWKWELL



	
HEMEL LODDON WILLIAMS LTD PLANNING & URBAN DESIGN • ARCHITECTURE	
1000000 1000000 1000000	Level 40 (Freehold) Location Plan FOR PLANNING PURPOSES ONLY Date: August 2009 Scale: 1:1250 (A1) Drawing No: 08/114/01