

Further Materials to support the representations of Mr A Allen – 20/04/2010

Purpose of Document

The purpose of this document is to provide the inspector of the core strategy plan with additional information to further substantiate and clarify the representations made by Mr A Allen during the public consultation period for the core strategy document, and to demonstrate that she should find the core strategy unsound.

The specific representations that this documentation relates are 15792, 15767, 15783, 15790, 15788, 15794, 15797, 15791.

References

The following documents have been referred to and/or quoted within this representation:

- The SHLAA document published November 2009
- The Core Strategy Document
- Rochford District Council's Statement of Community Involvement published January 2007
- Planning Policy Guidance 2 : Green Belt
- Correspondence in relation to a complaint raised by Mr Allen against Rochford District Council (No. 654), Local Government Ombudsman Investigation reference 9018786).
- RDC Produced information with relating to Site 207 (Call for Sites)

The Representations

The representations raised by Mr Allen during the public consultation exercise with regards the Core Strategy were produced at the time with the limited data available. Since this time RDC have made available more information to the public.

It is therefore necessary to clarify and further define the original objections raised by Mr Allen.

The Core Strategy discriminates against small preferred locations

Upon reading the core strategy and its evidence base it becomes apparent that the identification of preferred locations has favoured large preferred locations, and discriminated against identifying smaller preferred locations.

Advantages of Selecting smaller preferred locations.

The selection of more numerous smaller preferred locations would offer advantages over the use of a lower number of larger preferred locations. Smaller more numerous preferred locations located on the current fringe of the urbanised boundary would:

- not result in large scale expansion of the urbanised sprawl of existing settlements in a few large locations. It would result in the a minor increase in the urbanised sprawl in more places.
- integrate more effectively into their surrounding locations. Large preferred locations selected by RDC will completely redefine the location for existing residents.
- would be better for the local economy. Smaller preferred sites are more likely to be actioned by smaller, local builders/developers and less attractive to larger national based building/development businesses. Local builders are more likely to employ local people, and thus would provide much needed work for the local community. The more local people working means the greater ability the local community will have in being able to afford to afford their own home. More money will be retained in the local economy rather than it disappearing from the local economy as in the case of a large national building/development company.
- not result in the concentration of additional traffic into a low number of areas during either construction or post construction.
- result in less need to use greenbelt land for the purposes of providing access to dwelling houses. Smaller locations situated on the edge of the urbanised area will be more likely to have road infrastructure leading to the site that can be reused, as opposed to having to provide wholly new infrastructure.
- less likelihood of neighbouring settlements merging. (Rawreth and Rayleigh!)
- better safeguarding of the open countryside from encroachment. Many of the preferred locations detailed in the core strategy are situated on productive open farmland which provides views of the open countryside. Smaller sites as preferred locations are far less likely to be productive open farmland. They are also likely to contribute less to the openness of the countryside.
- better preservation of the character of towns and communities.
- just as effective in assisting urban regeneration as large preferred locations.
- the use of more numerous smaller sites would result in a more balanced development of RDC rather than excessive development in a few locations.

RDC's preference for larger sites (whether by design or not) has not been stated in the core strategy or its evidence base but it is obvious that the core strategy has favoured large sites.

RDC has not provided adequate justification as to why this is the best approach as opposed to the benefits of utilising smaller more numerous sites around the fringe of existing settlements.

Evidence

There is no data in the evidence base that:

- formally states that large locations are preferred over small locations.
- justifies preferring larger preferred locations over smaller preferred locations and does not provide evidence of reasoning as to why this is the case.

There is evidence that smaller locations have been discriminated against despite the benefits, as follows:

- Letter from Mr Scrutton in appendix A dated 1st February 2010 "The land you have put forward is of modest size (0.4Ha) and is not of strategic significance so far as the preparation of the core strategy is concerned". This statement demonstrates that RDC have discriminated against small sites. Find the attached.

Representation 15791 posed the question "Why is North London Road the Only site where future housing development is appropriate. No additional information has been provided to answer this question. Mr Allen believes that this is because there is no additional information available. He also stated that the core strategy should "detail the process that was employed to identify North London Road site as the best for

development". This information has not been provided either. This demonstrates that the option of using smaller preferred locations has not been considered.

The preferred options document referred to in Mr Allen's representation 15791 made reference to South East Rayleigh development as undesirable because it would cause coalescence and accessibility problems for services. As Mr Allen stated in this representation, it is not true that all sites available in this geographical area would result in these problems. The statement made in the preferred options document may have been true if the assumption was to utilise large preferred locations, but it is not true for small preferred locations within South East Rayleigh. No additional information has been provided to substantiate the statement in the preferred options document published October 2008. The preferred options document also discriminated against small preferred locations.

The core strategy was released for public examination on the 21st September. Under the terms detailed in the SHLAA site 207 required a site visit. This was undertaken on the 22nd September 2009, so the detail of the survey could not have been considered as part of the core strategy, again demonstrating that smaller preferred locations have been discriminated against.

The inspector should find the Core Strategy unsound on this basis.

The construction of the Core Strategy has not adhered to the RDC Statement of Community Involvement

Section 6.1 of RDC's Statement of Community involvement states "Rochford District Council recognises the importance of maintaining dialogue between contributors to the planning process and the council. The council will seek to keep the public informed on all planning matters. In particular the council will keep those involved in the process up to date and explain how their views have contributed to the final decision reached, as well as the various stages of consultation."

Mr Allen has sought to obtain dialogue with RDC on the following points since 22/01/2010.

- the provision of evidence to demonstrate diligence with regards information provided to the public during the consultation period.
- detail of who, and what processes have been employed to ensure the accuracy and integrity of information provided (SHLAA, core strategy, assessments of the sites submitted into the call for sites).
- clarification as to why one only a partial list of the sites submitted into the call for sites were published before and during the public consultation period for the core strategy.

No answers to these points have been supplied and as such Mr Allen has raised a formal complaint with RDC (654) which is currently being investigated by the Local Government Ombudsman (9018786).

In addition many of Mr Allens representations raised during the consultation period related to the lack of supporting information available to support/substantiate the core strategy, RDC have made no attempts to supply this information or respond to his representations.

In addition to this the public were not:

- consulted on the method to be employed with regards the identification of RDC's preferred locations.
- provided with information to substantiate statements included in the core strategy or its evidence base such as "South East Rayleigh would result in the coalescence between Rayleigh and Eastwood".

RDC has not acted as per its own Statement of Community involvement as follows:

- it has not responded to questions raised from members of the public privately, as in the case of Mr Allens complaint.

- it has not responded to questions raised and requests for additional information from the public during the public consultation period of the core strategy.

- it has not provided sufficient evidence, as part of its evidence base, to substantiate the core strategy or demonstrate diligence.

The inspector should find the Core Strategy unsound on this basis.

The Core Strategy has not properly considered Planning Policy Guidance 2: Green Belt

Section 1.4 states " The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the most important attribute of Green Belts is their openness."

and

3.13 "When any large scale development or re-development of the land occurs in the green belt it should , so far as possible contribute to the achievement of the objectives for the use of land in Green Belts (as para 1.6) This approach applies to large-scale developments irrespective of whether they are appropriate development, or inappropriate development which is justified by very special circumstances. Development plans should make clear the local planning authorities intended approach.

The selected preferred locations will result:

- in a significant increase in the urban sprawl of existing settlements
- have a significant impact on the openness of the green belt.

Both of the above problems at least partly avoidable, if RDC adopts a policy of not discriminating against smaller preferred locations.

Mr Allen concludes that RDC have not considered Planning Guidance 2 Green Belts fully.

The inspector should find the Core Strategy unsound on this basis.