

No. 8324 / 16479, 16480 and 16560

## **Rochford Core Strategy Public Examination**

### **Statement on Matter 2 “Location and Supply of New Homes”**

**Prepared by**

**Sellwood Planning**

**on behalf of**

**The Aston Unit Trust and**

**Mr John Needs**

**April 2010**

## 1.0 Introduction

1.1 This statement is submitted on behalf of The Aston Trust and Mr John Needs who are the owners of land to the south of Wellington Road, Rayleigh. It relates to Matter 2 “Location and Supply of New Homes”.

## 2.0 (Q(A)) “Will the strategy deliver the number of new homes required to meet the RSS requirements?”

2.1 It is considered that the Core Strategy, as submitted, is unlikely to deliver the minimum housing provision as required by the RSS. As a consequence, the Core Strategy is unsound. The primary reason for this is that the Core Strategy makes a range of unrealistically optimistic assumptions about the components of the land supply and contains no contingency or flexibility if one or more of these components is delayed or fails to come forward as anticipated.

2.2 Flexibility is a key element in Government objectives for Core Strategies. Paragraph 4.46 of PPS12 emphasises this as follows

**“A strategy is unlikely to be effective if it cannot deal with changing circumstances. Core Strategies should look over a long time frame – 15 years usually but more if necessary. In the area of the built and natural environment many issues may change over this time. Plans should be able to show how they will handle contingencies : it may not always be possible to have maximum certainty about the deliverability of the strategy. In these cases the core strategy should show what alternative strategies have been proposed to handle this uncertainty and what would trigger their use. Authorities should not necessarily rely on a review of the plan as a means of handling uncertainty”.**

2.3 The main concerns about the components of land supply can be summarised under the following headings

- (a) Extant Planning Permissions : The Core Strategy appears to assume that all extant planning permissions will come forward by 2010. It is normal for Core Strategies to allow a percentage discount (after 10% to 15%) to allow for non implementation. Non implementation can occur for a number of reasons such as a change of ownership (particularly for smaller sites) and companies obtaining planning permission for their premises as a longer term valuation exercise
- (b) Allocations : It is not clear from this evidence base whether existing allocations have been re-evaluated as part of the Core Strategy process and their reasons for historic non implementation explored. If an allocation has not come forward during the housebuilding peak of 2005 / 2007, it must be questionable whether it will come forward in a more recessionary environment where land values have halved. Clarification is required why allocations are referred to in the Table on pages 39 and 40 but not in the Table on page 57
- (c) Identified SHLAA Sites : Most of the identified SHLAA sites are relatively small sites on previously developed land. This category of land supply is notoriously difficult to predict since the yield of dwellings is clearly linked to the value of land with a residential planning permission compared with an alternative or existing use value
- (d) Employment Sites : The Core Strategy relies on four employment sites to 795 dwellings between 2008 / 9 and 2020 / 21 (see table on page 57). However, old employment premises tend to be beset by implementation constraints such as
- existing leases and sub leases
  - contamination
  - existing use values
  - potential for alternative uses
  - flood risks (in the case of Stambridge Mill).

2.4 Many of these constraints were acknowledged by Rochford Council in the 2007 Rochford Urban Capacity Study. However, these concerns appear to have now

disappeared since the Core Strategy relies on all of these employment sites being completed by 2021.

2.5 This Core Strategy is unsound in terms of housing land supply for two reasons. First, it makes entirely unreasonable assumptions about the likely yield from the various components of land supply. Secondly, it compounds this by giving no guidance in terms of a contingency strategy if one or more of the components of land supply fails to come forward. It is considered that the plan can only be made sound by the following three amendments

(a) re-assess the components of land supply on a more reasonable and realistic basis.

This will reduce the available dwelling supply

(b) acknowledge that additional sustainable greenfield (and Green Belt) land will have to be identified in order to meet the minimum provision in the RSS

(c) the allocation of additional greenfield sites should be led by a clear settlement strategy policy which directs new allocations to the larger settlements where there is the greatest potential to achieve a more sustainable pattern of development. This would include land on the eastern side of Rayleigh as promoted by The Aston Unit Trust and Mr John Needs.

### **3.0 (Q(B)) “Is the Core Strategy consistent with PPS3?”**

3.1 (i) **“the requirement to address housing delivery for at least 15 years from the date of adoption”** : The Council has adopted a plan period of 2010 to 2025. This is the absolute minimum fifteen year period set out in paragraphs 4.13 and 4.16 of PPS12. Given that all the urban extensions will entail a review of Green Belt boundaries, it is considered that greater weight should have been given to paragraphs 2.6 to 2.11 of PPG2 (Green Belt) that it is necessary to establish boundaries that will endure and not require an early further review.

- 3.2 In the case of the Rochford Core Strategy, the adoption of the minimum time span means that Green Belt boundaries are likely to have to be reviewed sooner. Given these considerations, it is suggested that the plan period is extended to 2031. Whilst there is not an adopted RSS to 2031, such an approach would be entirely consistent with PPS12 and PPS3 and (for example) has recently been endorsed elsewhere in the East of England by an Inspector in the case of the Forest Heath Core Strategy (April 2010).
- 3.3 Whilst a 2031 end date is the most appropriate way forward for the Core Strategy, it is also considered that given the inherent uncertainties in the Core Strategy process it cannot be guaranteed that the document will be adopted in the course of 2010. As a minimum, the Core Strategy should take the prudent course of action and roll the plan period forward to 2026. This will require the identification of a further 250 dwellings.
- 3.4 (ii) **“Bearing in mind that Green Belt releases may be necessary, does the CS provide the appropriate context and give adequate guidance for a subsequent site allocations DPD readily to identify the land needed without having to revisit strategic consideration”** : The original representations submitted on behalf of The Aston Unit Trust and Mr J Needs pointed out that the Core Strategy lacks a clear settlement hierarchy and strategy to guide both the Sites Allocations DPD and the determination of planning applications. Since it is clear that proposed components of land supply will not deliver the RSS housing provision, more land will need to be released from the Green Belt. Since not all of these sites will be ‘strategic sites’ (PPS12 paras. 4.6 and 4.7), the plan needs to give more guidance to assist the preparation of the Sites Allocation DPD. This guidance should be based on the principle of identifying
- sites at the larger and more sustainable settlements
  - sites whose release from the Green Belt would have the least impact on the purposes of the Green Belt
  - sites where a long term and defensible boundary can be defined.

- 3.5 Without these amendments, the Core Strategy will provide insufficient guidance to subsequent DPDs and be unsound.
- 3.6 (iii) **“Is there sufficient flexibility and will the CS deliver a continuous supply of housing land”** : As noted in relation to the earlier response on Issue 2(A), the Core Strategy is notable for its almost complete absence of flexibility in terms of housing land supply. It would appear that the Council’s over-riding objective has been to minimise the release of Green Belt land and, therefore, it sets out the components of land supply and a plan period to achieve this.
- 3.7 The division of the housing supply into two periods (H2 being 2010 to 2021 and H3 post 2021) embeds a further degree of inflexibility in the plan. Since the delivery of the various sites is inherently unpredictable, the two policies should be combined into one covering the whole plan period. Whilst the new policy could still indicate broad phasing, a single policy would make it easier for the post 2021 sites to be brought forward if some of the pre 2021 sites failed to deliver, in whole or part.
- 4.0 (Q(C)) “Are the broad locations identified for the supply of new housing the most appropriate when considered against all reasonable alternatives?”**
- 4.1 The Core Strategy sets out a vision and objectives which seek to move towards a more sustainable pattern of development. This is perhaps best summarised in paragraph 4.19 where it is explicitly stated that the plan will direct development to the most sustainable locations having regard to a range of criteria. However, this is not reflected in some of the broad locations for new housing development which are in sub optimal locations and not appropriate when considered against all reasonable alternatives.
- 4.2 Whilst paragraphs 2.67 to 2.73 articulate the start of a spatial strategy, this should be translated into a new policy which seeks to concentrate the majority of new development at the ‘first tier’ settlements of Rayleigh, Rochford and Hockley. The plan also notes the pre-eminent role of Rayleigh (12.18) as having

- the largest population (2.21)
- the most people on the housing waiting list (2.38)
- the best access to services (2.68)
- the largest retail centre in the district (2.68 and 12.18)
- the most comprehensive range of facilities (12.13).

4.3 Given this pre-eminent role of Rayleigh, it is unclear why the town is proposed to have no H2 releases between 2010 and 2015 (Rochford has 450), only 500 dwellings between 2015 and 2021 and then no Policy H3 allocations after 2021. A sustainable land use strategy which seeks to more closely collocate new housing with jobs, public transport, services and facilities would be expected to focus a greater proportion of the Policy H2 and H3 new housing in the largest settlement in the district.

4.4 Having under allocated housing to Rayleigh, the plan proposes to direct significant levels of development to the second tier settlements of Hullbridge and Great Wakering. It is interesting to note what paragraphs 2.61 and 2.70 say about second tier settlements

**“The second tier comprises Hullbridge and Great Wakering. These settlements have a more limited range of services and access to public transport is relatively poor”.**

**“Away from the three main settlements, car dependency is high”.**

4.5 Given the distinctly inferior sustainability credentials of Hullbridge and Great Wakering, the evidence base does not support the proposal to allocate 500 dwellings at Hullbridge and 250 at Great Wakering in the period to 2025. A more reasonable alternative, which would more closely accord with both the objectives of the Core Strategy and national policy, would be to direct some of the Hullbridge and Great Wakering housing provision to the available and suitable sites around Rayleigh.

4.6 It is suggested that the 2010 – 2025 housing provision for the second tier settlements is reduced to 200 in the case of Hullbridge and 150 at Great Wakering. This would still allow for an element of local need to be met in these villages. It is suggested that

these reductions are matched by an increase in the housing allocation at Rayleigh and, to a lesser extent, the other first tier settlements.

- 4.7 An available and deliverable broad location in Rayleigh is the land to the south of Wellington Road, Rayleigh (“North East Rayleigh, south of the B1013”) owned by The Aston Unit Trust and Mr J Needs. This is within walking distance of the town centre, primary and secondary education and a wide range of facilities and services. The land is also strongly defined by a well established tree and hedge line to its east which would form a long term defensible boundary to the Green Belt. The site has a capacity of around 200 dwellings and has no constraints which would prevent its early delivery. Appendix 1 contains a plan of the site.
- 4.8 In summary, the sustainable objectives of the planning system will only be achieved in Rochford District if new dwellings are directed to the largest and most sustainable settlements such as Rayleigh. The Core Strategy, as submitted, runs counter to this approach by limiting H2 and H3 allocations in Rayleigh and proposing large and disproportionate dwelling allocations at the less sustainable villages of Hullbridge and Great Wakering. Such an approach is not supported by the evidence base and is not the most appropriate strategy when considered against all reasonable alternatives.

## **5.0 Questions 2(D) to 2(G)**

- 5.1 No comment.