

REVISED MATTERS AND ISSUES FOR THE ROCHFORD CORE STRATEGY EXAMINATION

Response on behalf of Crowstone Properties Ltd.

We set out below various points which we consider are of relevance to certain of the Matters and Issues identified by the Inspector (31/03/10).

1. Spatial Vision

a) Does the CS present a clear spatial vision of the Borough?

We identified various specific criticisms in our representations on the Submission document, the main thrust of these criticisms being:-

- The absence of a holistic approach whereby a key objective must be to make the entire District more sustainable i.e.: more self-contained and self-sufficient.
- The choice of strategic locations being largely arbitrary and housing orientated rather than being influenced by a comprehensive, mixed use approach to also provide associated employment, public open space etc.

The former is essentially a criticism of the Plan's spatial vision, and is fundamental to the Plan's soundness, whilst the latter criticism is a direct consequence of the first criticism, namely the handling of residential, employment, public open space and other uses and proposals as separate topics in geographically distinct compartments - with no apparent recognition of their spatial relationships in terms of selecting the most sustainable locations. Both criticisms combine to make the selection of strategic sites arbitrary. This approach therefore does not assist a clear understanding of the spatial strategy, as questioned by the Inspector in 1d). (qv).

b) Will the CS deliver sustainable development in accord with national and regional policy?

The current unsustainably heavy reliance on out-commuting plus the failure to deal with housing, employment and community facilities in a co-ordinated way suggest the answer to this question is probably "no".

c) Is there consistency with PPS 12 - para.4.5 in terms of the location of growth?

We consider there is clarity in this respect insofar as the CS relates to the distribution of housing but the case has not been made, and should not be made, that all strategic site selection should be driven by housing distribution alone. As stated in a) above, unless the selection of strategic sites takes full account of access to existing and new employment, public transport and community services etc., then the Plan's sustainability credentials must be in doubt.

d) Does the Topic-based approach work?

We have referred to this in a) above. In particular we have alleged that the CS is “Not Effective” in view of the lack of co-ordination between housing and employment provision. We agree that a far better understanding would be achieved of the CS if the vision/strategic objectives for the different topics/land uses could be drawn together.

2. Location and Supply of New Homes

- b) i) Whilst we are generally satisfied in terms of the case put forward for the controlled release of GB land, we continue to question the absence of a strategic site on the west side of Ashingdon and the proposed phasing arrangements for Ashingdon as a whole.
- b) ii) Having regard to the significant role of Ashingdon in delivering new housing, we have queried the vacuum in new strategic housing provision there between 2015-2021. We consider that a continuous supply would be better achieved by allocating 250 in the period 2015-21 and 250 in the post-2021 period – as at Hullbridge.
- b) iii) As noted above, we have concerns about the reasonableness of the broad locations in the absence of a comprehensive, mixed use approach to ensure future development is sufficiently sustainable in order to positively counter the current highly unsustainable characteristics of this District. In the absence of a comprehensive and mixed use approach, we strongly suspect that the CS is seriously flawed in terms of its ability to deliver sustainable development. Indeed, the absence of mixed use locations in the CS places an unduly heavy burden on the SA DPD to address - or even redress - this situation, assuming it is capable of doing so.

We have already indicated that the rejection of West Ashingdon as a strategic location is a case where one possible option has been unreasonably discarded as it would have enabled a strategic site to be released in association with public open space and to secure environmental benefits. None of these benefits are offered to the same degree by sites on the eastern side of Ashingdon.



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