

ROCHFORD CORE STRATEGY EXAMINATION

STATEMENT BY

CHRISTOPHER WICKHAM ASSOCIATES (4961)

ON BEHALF OF

INNER LONDON GROUP (9917)

POLICY H1 - THE EFFICIENT USE OF LAND FOR HOUSING

REPRESENTATION ID: 16190

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1. INTRODUCTION

- 1.1 In November 2009, the Inner London Group (ILG) made representations in support of Policy H1 of the Core Strategy (CS) Submission Document. It is considered that the approach of prioritising the re-use for housing of previously developed land is sound. More specifically, the redevelopment of the vacant sites owned by ILG at Stambridge Mills and at the former brickworks site in Star Lane, Great Wakering (part of the 'Star Lane Industrial Estate') will reduce the need to release Green Belt land, and will allow for the removal of contamination, the re-use of existing on-site materials, and the environmental and ecological enhancement of the sites and their surroundings.
- 1.2 This statement responds to the 'Matters and Issues for Examination' identified by the CS Examination Inspector, in so far as they relate to the matters raised by ILG under Policy H1. The matters and issues of relevance fall under the headings of (i) the location and supply of new homes, and (ii) flood risk.

2. LOCATION AND SUPPLY OF NEW HOMES

- 2.1 In relation to the requirement of PPS3 that local development documents should set out policies and strategies to address housing delivery for at least 15 years (taking account of the level of provision identified in the RSS), it is considered that CS Policy H1 correctly identifies Stambridge Mills and the Star Lane former brickworks site (part of the Star Lane Industrial Estate) as sites which are deliverable within the first 5 years. To be considered deliverable, paragraph 54 of PPS3 requires sites to be available, suitable and achievable. For the reasons set out below, both sites are considered to comply with these requirements.

Availability

- 2.2 Both sites have been acquired by ILG for residential redevelopment. ILG enjoy full and unencumbered freehold ownership of both sites, and there are no title issues on either site which would prevent redevelopment proceeding.
- 2.3 The Stambridge Mills site is located approximately 1.5 kilometres to the south-east of Rochford town centre. The site, which has a frontage onto the north bank of the River Roach, is occupied by a substantial group of redundant mill buildings and associated structures. The tallest buildings at the site rise to a height of approximately 27.50 metres. The undeveloped parts of the site are laid to hardstanding. The existing buildings and other structures at the site are a prominent feature and are widely visible within the flat estuarial landscape. The site, which has been vacant for a number of years, adjoins the Broomhills Care Home and residential properties in Mill Lane.
- 2.4 The Star Lane former brickworks site is located to the south-west of Great Wakering, to the south of industrial premises. Taken together, the former brickworks site and the industrial premises to the north form the Star Lane Industrial Estate for the purposes of policies within the CS. The former brickworks site comprises an extensive area of hardstanding but all original buildings have now been demolished following the cessation of the former use some years ago.
- 2.5 In light of the above, it is evident that both sites are available for immediate redevelopment subject to the need for planning permission and site clearance.

Suitability

- 2.6 The redevelopment of both sites for residential purposes is consistent with the Government's objective of prioritising the re-use of previously developed land, in particular vacant and derelict sites, for new housing (PPS3, paragraph 36). In both cases, the re-use of the sites for industrial purposes would not be viable, and neither site is considered suitable for such use. In the case of Stambridge Mills, industrial use would conflict in amenity terms with neighbouring residential development (including the listed Broomhills Care Home), and would generate substantial commercial traffic through Rochford town centre. The site at Star Lane is remote from the trunk road network. There are clearly more appropriate locations for employment development in central and western Rochford (as confirmed by CS Policies ED3 and ED4).
- 2.7 The site at Stambridge Mills lies within Flood Zone 3a on the Environment Agency (EA) Flood Maps, and current flood defences in the vicinity do not provide adequate long-term protection for the site or the adjoining care home and residential uses. However, for the reasons explained in section 3 of this statement, residential development of the site will be consistent with the requirements of PPS25. All but a small part of the site falls outside the Green Belt, and that part which is subject to Green Belt designation is not proposed for built development.
- 2.8 Development of Stambridge Mills will also comply with wider sustainability objectives through the retention and conversion of various existing structures at the site, and the re-use of on-site materials for the construction of the improved flood defences. Residential redevelopment will contribute to the supply and choice of new homes in the Rochford area, will reduce pressure for the release of Green Belt land, and will offer substantial visual amenity benefits. The site is located within reasonable distance of the retail, employment and service facilities in and around

Rochford town centre. As part of the proposals for the site, ILG intend to offer a package of accessibility enhancements including footpath and bus service improvements.

- 2.9 The Stambridge Mills site is therefore considered to represent a suitable location for residential development.
- 2.10 The Star Lane former brickworks site does not lie within an area liable to flooding, and enjoys ready access to local facilities. The site has a road frontage and an existing access point onto Star Lane. As an accessible plot of vacant and derelict previously developed land outside the Green Belt, the site is considered to be intrinsically suitable for residential development.

Achievability

- 2.11 ILG have prioritised the Stambridge Mills site for development. Ongoing discussions with the LPA are proving to be very constructive, and the emerging proposals have been the subject of supportive feedback from the Inspire East Design Review Panel. Natural England has also been fully consulted, and has confirmed that the proposals do not give rise to any substantive objection on ecological impact grounds.
- 2.12 The emerging scheme for the site comprises the retention of some of the existing industrial buildings, and their conversion to apartments. The remainder of the site will comprise new apartment buildings, family housing and communal open space including an accessible and attractive wharf side frontage. It is anticipated that the scheme will bring forward circa 200 residential units.
- 2.13 It is intended that the planning application for the Stambridge Mills site will be lodged within the next 4-6 weeks. The application will be accompanied

by a full Environmental Statement (ES) which will assess the scheme's impact in relation to transport, hydrology, flood risk, drainage, contamination, geotechnical, noise, vibration, ecology, air quality, landscape and socio-economic issues. A draft ES has been prepared.

- 2.14 In light of the above, it is anticipated that a decision on the planning application is likely to be forthcoming during the autumn of this year. If planning permission is granted, ILG propose to implement the scheme during 2011.
- 2.15 In relation to the Star Lane former brickworks site, ILG intend to bring forward draft proposals for discussions with the LPA in the near future with a view to lodging a planning application at the earliest opportunity. Initial site appraisal work indicates that the scheme will bring forward circa 225 dwellings in a mix of low level apartment blocks and family housing. If planning permission is granted, implementation of the scheme is likely to go forward in the first half of 2012.
- 2.16 In view of the above, it is clear that development at both sites is readily achievable well within the next 5 years.

3. FLOOD RISK

- 3.1 As previously stated, the site at Stambridge Mills lies within Flood Zone 3a on the EA Flood Maps, and current flood defences in the vicinity do not provide adequate long-term protection for the site or the adjoining care home and residential uses. It should be noted that ILG have engaged in detailed and constructive discussions with the EA relating to the resolution of flood risk issues arising at Stambridge Mills (see further below). ILG have commissioned specialist advice on flood protection matters, and a full Flood Risk Assessment (FRA) has been submitted to the EA and the LPA.

- 3.2 As required by PPS25 (paragraphs 14-17), a Flood Risk Sequential Test has been undertaken (both by ILG and by the Council). The Council has confirmed that the Sequential Test has been passed (see CS Topic Paper 1). The EA's representations on the CS Submission Document, insofar as they assert that no Sequential Test has been applied to the site, pre-date the Council's formal confirmation that the test has been applied and passed. The Sequential Tests carried out by ILG and the Council both conclude that the amount of land which is appropriate for residential development in Rochford, i.e. land which is not subject to Green Belt or other restrictive planning designations, is very limited.
- 3.3 Although the Stambridge Mills site is currently at risk from flooding, it is proposed that development of the site will be accompanied by substantial new flood defence works, and the raising of all residential accommodation above the 1 in 200 year flood level. The detailed design of these defences has been agreed with the EA.
- 3.4 The flood defence strategy has been informed principally by the local topography. Existing riverside defences will be improved to meet the standard of protection required by PPS25, and counter-walls will be constructed to higher ground to prevent the defences being outflanked. The location of the counter-walls has been chosen to make use of existing features such as field boundaries and raised access tracks and to minimise their length. Their location in turn dictates the extent of riverside defences that have to be improved. This solution has also to be delivered on land within control of the developer. The crest level of the defences has been set to be 600mm above the level of the predicted 1 in 200 year flood level in line with good practice.
- 3.5 A significant aspect of the proposed strategy is the benefit provided to the wider community. The combination of improving the existing defences and

constructing counter-walls to higher ground will not only protect the proposed development and ensure dry access is maintained in times of flood, but will also protect Broomhills Care Home and residential properties on Mill Lane. In addition, the proposed defences will protect Stambridge Road from flooding; this road provides an important transport route to the villages to the east of Rochford.

- 3.6 Having satisfied the Sequential Test, it is necessary in accordance with the requirements of PPS25 (paragraphs 18 and 19) to carry out an Exception Test. Paragraph D9 (Annex D) of PPS25 states that for the Exception Test to be passed, three criteria must be met.
- 3.7 Under criterion a), *“it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk....”*. In the case of the proposed development of the Stambridge Mills, the scheme will reduce the need to release Green Belt land to meet housing needs, and will offer the opportunity for a substantial enhancement of the landscape in the area immediately to the east of Rochford. The re-use of existing resources, and the removal of contamination, will also bring about clear-cut sustainability benefits for the community. Furthermore, the scheme will offer specific benefits to existing residents in the immediate area through the improvements to existing flood defences. It is therefore considered that compliance with criterion a) of the Exception Test is achieved.
- 3.8 Under criterion b), *“the development should be on developable previously-developed land or, if it is not on previously-developed land, there are no reasonable alternative sites on developable previously-developed land”*. The Stambridge Mills site constitutes previously developed land in its entirety. Furthermore, the site meets the PPS3 definition of *“developable”* for the reasons stated above. It is therefore considered that compliance with criterion b) of the Exception Test is achieved.

- 3.9 Under criterion c), a Flood Risk Assessment “*must demonstrate that the development will be safe, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall*”. The submitted FRA demonstrates that the proposed improvement and extension of the existing tidal flood defences will render the development safe from flooding, will not increase the risk of flooding elsewhere, and will provide enhanced protection from flooding for the existing care home and other residents in the vicinity of the Stambridge Mills site. The principle of the proposed improvement to the existing defences has been agreed with the EA subject to consideration of the residual risk of development behind flood defences. Discussions with the Emergency Services, relating to issue of safe access and egress in the highly unlikely event of the breach of the flood defences, are ongoing. It is therefore considered that compliance with criterion c) of the Exception Test can be readily achieved.
- 3.10 It is recognised that only those representors seeking changes to the CS are normally entitled to contribute to the hearing sessions. However, if it would assist the Inspector, ILG would be pleased to appear at the hearings in May in order to provide up-dated information on flood risk issues, including the latest feedback from continuing discussions with the EA, and any other matters relating to the proposed development of the Stambridge Mills site.

4. CONCLUSION

- 4.1 Policy H1 is therefore considered to be sound in that it is justified and effective, and is consistent with national policy. The sites at Stambridge Mills and at the former brickworks in Star Lane, Great Wakering, comprise previously developed land which is correctly prioritised for residential use. Such use will assist in meeting the RSS housing requirements for Rochford district, and both sites are clearly deliverable in terms of the requirements of PPS3.

- 4.2 The development of the site at Stambridge Mills is consistent with the requirements of PPS25 in that the Sequential Test has been passed, and the Exception Test can be met.
- 4.3 In view of the above, the allocation by Policy H1 of the sites at Stambridge Mills and at the former brickworks in Star Lane, Great Wakering, for residential purposes is strongly supported by ILG.

CHRISTOPHER WICKHAM ASSOCIATES
April 2010

ROCHFORD CORE STRATEGY EXAMINATION

STATEMENT BY

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ON BEHALF OF

INNER LONDON GROUP (9917)

POLICY H2 - EXTENSIONS TO RESIDENTIAL ENVELOPES & PHASING

REPRESENTATION ID: 16196

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1. INTRODUCTION

- 1.1 In November 2009, the Inner London Group (ILG) submitted an objection to Policy H2 of the Core Strategy (CS) Submission Document. This objection was on the basis that the proposed releases of land for development at Hullbridge and Canewdon are considered to be sustainable. New housing should be directed to settlement extensions with a close and more sustainable relationship with Southend including the second tier settlement of Great Wakering which is wrongly omitted as a location for expansion prior to 2021. Development to the south-west of Great Wakering would successfully relate to the development of the Star Lane Industrial Estate which is earmarked for residential use under Policy H1.
- 1.2 This statement responds to the 'Matters and Issues for Examination' identified by the CS Examination Inspector, in so far as they relate to the matters raised by ILG under Policy H2. The matters and issues of relevance included under the general heading of 'Location and Supply of New Homes'.

2. LOCATION AND SUPPLY OF NEW HOMES

- 2.1 The settlements of Hullbridge and Canewdon are considered to be unsustainable locations for substantial additional residential development. Neither settlement, and in particular Canewdon, is well located in relation to the main service centres including Southend on Sea. Furthermore, in both cases, development would involve significant intrusion into the local landscape with consequent harm to the character and openness of the Green Belt.
- 2.2 By contrast, the opportunity arises at South West Great Wakering to provide an extension to the settlement in a sustainable manner which

minimises visual intrusion into the Green Belt. ILG considers that development of the extensive plot of land located to the east of the Star Lane Industrial Estate, to the south of High Street, and to the north and east of the 'lakes', would comprise a logical extension of the development of the Star Lane Industrial Estate, as proposed under CS Policy H1 for development within 5 years. The land in question is readily accessible via the former brickworks site (part of the Star Lane Industrial Estate site), and could also be delivered within 5 years because it falls under ILG's control. The 'lakes' would provide a highly defensible boundary to the Green Belt, and elsewhere along its flanks, the land would be enclosed by existing development boundaries. Development in this location would minimise impact on the openness of the Green Belt by largely 'enclosing' new built form within an arc of existing development boundaries.

- 2.3 Whilst some degree of phasing of development would be appropriate, there is no reason to delay development at South-West Great Wakering until after 2021. Infrastructure improvements could be secured where appropriate through S.106 contributions, and good access to the local road network from Star Lane is immediately available. The location is also readily accessible to Southend, and enjoys reasonable access to public transport. Great Wakering itself provides a reasonable range of local services which would be supported and developed as a result of new housing development.

3. CONCLUSION

- 3.1 CS Policy H2 is therefore considered unsound because it includes locations, at Hullbridge and Canewdon, which are considered unsustainable for the large-scale new residential development. Development in these locations would also harm landscape character and the reduce the openness of the Green Belt.

3.2 It is therefore suggested that Hullbridge and Canewdon are removed from Policy H2, and that South West Great Wakering is identified as an appropriate settlement extension suitable for development prior to 2021.

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ROCHFORD CORE STRATEGY EXAMINATION

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POLICY H3 - EXTENSION TO RESIDENTIAL ENVELOPES POST-2021

REPRESENTATION ID: 16198

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1. INTRODUCTION

- 1.1 In November 2009, the Inner London Group (ILG) submitted an objection to Policy H3 of the Core Strategy (CS) Submission Document. This objection was on the basis that the term 'West Great Waking' suggested the westerly extension of the settlement on land to the west of Star Lane, the north of Southend Road, and the west of Little Waking Road. Such expansion of Great Waking would be visually intrusive, and would not create a clearly definable boundary to the Green Belt, as required by PPG2. As such, Policy H3 was considered to be unsound.
- 1.2 Whilst it is recognised that the CS is concerned with identifying broad locations for development, it was considered that the description 'West Great Waking' might preclude the inclusion of more appropriate sites to the east of Star Lane and to the south of the High Street. Such locations could more appropriately be described as 'South-West Great Waking', and are considered to be generally more suited to development than the areas to the west of the settlement.
- 1.3 This statement responds to the 'Matters and Issues for Examination' identified by the CS Examination Inspector, in so far as they relate to the matters raised by ILG under Policy H3. The matters and issues of relevance included under the general heading of 'Location and Supply of New Homes'.

2. LOCATION AND SUPPLY OF NEW HOMES

- 2.1 The broad location for new housing development identified at West Great Waking is not considered appropriate if it is intended to preclude development to the south-west of the settlement. This is because development of land to the west of Star Lane and Little Waking Road would represent an unacceptable visual intrusion into the Green Belt with

no prospect of providing a defensible Green Belt boundary. Recent discussions with the Council suggest that the term 'West Great Wakering' is not intended to preclude a wider area including land to the south-west, and it is noted that the Allocation DPD Discussion and Consultation Document includes a broad area of interest which is centred upon a location which could be more accurately described as 'South-West Great Wakering'.

- 2.2 Notwithstanding the above, attention is drawn to the objection by ILG in relation to CS Policy H2 (Representation ID: 16196). The objection states that the identified locations for development at South West Hullbridge and South Canewdon are considered unsustainable, and that, in preference to these locations, land at South-West Great Wakering is deliverable well before 2021.
- 2.3 ILG considers that development of the extensive plot of land located to the east of the Star Lane Industrial Estate, to the south of High Street, and to the north and east of the 'lakes', would comprise a logical extension of the development of the Star Lane Industrial Estate, as proposed under CS Policy H1 for development within 5 years. The land in question is readily accessible via the former brickworks site (part of the Star Lane Industrial Estate site), and could also be delivered within 5 years because it falls under ILG's control. The 'lakes' would provide a highly defensible boundary to the Green Belt, and elsewhere along its flanks, the land would be enclosed by existing development boundaries. Development in this location would minimise impact on the openness of the Green Belt by largely 'enclosing' new built form within an arc of existing development boundaries.
- 2.4 Whilst some degree of phasing of development would be appropriate, there is no reason to delay development at South-West Great Wakering until after 2021. Infrastructure improvements could be secured where

appropriate through S.106 contributions, and good access to the local road network from Star Lane is immediately available. The location is also readily accessible to Southend, and enjoys reasonable access to public transport. Great Wakering itself provides a reasonable range of local services which would be supported and developed as a result of new housing development.

3. CONCLUSION

3.1 CS Policy H3 is therefore considered unsound because (i) it incorrectly identifies/describes the general part of Great Wakering which is suitable for expansion, and (ii) even if this locational description is amended, the land at South-West Great Wakering, which is available and suitable for development, is deliverable within the next 5 years and therefore well before 2021.

3.2 It is suggested that South-West Great Wakering is identified as an appropriate settlement extension, albeit prior to 2021, under Policy H2.

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ROCHFORD CORE STRATEGY EXAMINATION

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POLICY ED3 - EXISTING EMPLOYMENT LAND

REPRESENTATION ID: 16213

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1. INTRODUCTION

- 1.1 In November 2009, the Inner London Group (ILG) made representations in support of Policy ED3 of the Core Strategy (CS) Submission Document. It is considered that the re-allocation for alternative uses of the now vacant and disused employment sites at Stambridge Mills and at the former brickworks, Star Lane, Great Wakering (part of the Star Lane Industrial Estate), is sound. Both sites have long been vacant. The redevelopment of these sites will minimise the need to release Green Belt land, and will allow for the removal of contamination, the re-use of existing on-site materials, and the environmental and ecological enhancement of the sites and their surroundings.
- 1.2 Policy H1 of the CS Submission Document supports the redevelopment of the above named sites for residential development, and this statement should be read in conjunction with the statement by this practice (on behalf of ILG) relating to Policy H1 (Representation ID:16190).
- 1.3 This statement responds to the 'Matters and Issues for Examination' identified by the CS Examination Inspector, in so far as they relate to the matters raised by ILG under Policy ED3. The matters and issues of relevance fall under the heading of 'Employment and Economic Development', and specifically relate to whether it is sound for Policy ED3 to reallocate the sites at Stambridge Mills and Star Lane for appropriate alternative uses in view of the need of the CS to ensure that sufficient land is available to meet the additional jobs required by the RSS in the most appropriate locations.

2. EMPLOYMENT AND ECONOMIC DEVELOPMENT

- 2.1 The redevelopment of both sites for residential purposes is consistent with the Government's objective of prioritising the re-use of previously

developed land, in particular vacant and derelict sites, for new housing (PPS3, paragraph 36). The continuing allocation of these sites for employment use is not considered to be appropriate in environmental or commercial terms.

- 2.2 The site at Stambridge Mills comprises a collection of purpose-built mill buildings of varying ages. The building group has emerged over time in response to the specific needs to the mill operation. The buildings are not suitable for conversion to modern business use, and it would not be viable to construct new industrial buildings in this location.
- 2.3 The re-use of the Stambridge Mills site for industrial purposes would conflict in amenity terms with neighbouring residential development. Even a light industrial use would generate substantial commercial traffic through Rochford town centre. In comparison to a residential scheme, an industrial development would also be likely to undermine the setting of the adjoining Broomhills Care Home which is a Grade II listed building.
- 2.4 The Star Lane Industrial Estate is remote from the trunk road network, and the existing buildings to the north of the former brickworks site comprise stock of a very low quality. The strategic access problems at Star Lane are recognised in the Council's Employment Land Study of 2008. The former brickworks site contains no buildings but would require considerable investment to bring forward modern employment floor space. Such development would not be viable.
- 2.5 The CS makes adequate alternative provision for the allocation of replacement employment land in more appropriate and sustainable locations.

3. CONCLUSION

- 3.1 Policy ED3 is therefore considered to be sound in that it is justified and effective, and is consistent with national policy. The sites at Stambridge Mills and at the former brickworks in Star Lane, Great Wakering, comprise previously developed land which is correctly reallocated and prioritised for residential use. Such use will assist in meeting the RSS housing requirements for Rochford district, and both sites are clearly deliverable in terms of the requirements of PPS3. The CS makes adequate and appropriate provision for additional employment land allocations in sustainable locations.

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