

Written Summary Submission of Rawreth Parish Council requesting Changes to Rochford District Council's Core Strategy

18 April 2010

1.1 This document, provides a summary of Rawreth Parish Council's Representations and objections to the soundness of the Core Strategy (CS) in the light of the published 'Matters and Issues for Examination'. It should be read in conjunction with the Parish Council's representations made to the Council dated 25 October 2009, .which were acknowledged under Personal Reference 7342, Representation Numbers 16466 to 16475 inclusive.

Spatial Vision

1.2 The first concern of the Parish is that there is no clear Spatial Vision or Strategy within the CS. There is little cohesive analysis or solutions within the CS as to how the different competing interests of protecting the environment whilst achieving a viable and sustainable economy and the sustainable location of housing development will be achieved. The Parish is not convinced that the CS is capable of managing these competing interests and how the Districts towns, villages and countryside will be valued with their own identity in the future.

1.3 In the absence of a clear spatial vision, the District Council within its CS has reverted to the traditional method of drafting a Local Plan. It is therefore considered that despite the Council's vision of making "*Rochford District a place which provides opportunities for the best possible quality of life for all who live, work and visit here*", that little balance has been struck between short term social and economic requirements and long term social and environmental impact and needs of residents. The Parish concludes that because of this, the Council has omitted almost any reference to spatial vision or spatial strategy.

1.4 Paragraph 4.5 of PPS12 requires that the core strategy makes clear spatial choices about where developments should go in broad terms. The document is certainly clear as to where development is to be directed, but fails to demonstrate with full analysis how it arrived at these decisions. Despite what is stated at paragraph 4.19 of the document, what appears to have first determined where development will be directed is set out at paragraph 4.18 of the CS. Put simply the CS is simply advocating that development on the edge of the settlements will occur and this will be equally shared out. This seems to be a highly unsophisticated approach in planning terms and again appears to demonstrate that the document is unsound.

Location and Supply of New Homes

2.0 The Parish Council's letter of 25 October 2009 sets out its detailed concerns succinctly. The Parish asks the inspector to note that the settlement of Rawreth and its surrounding area falls within tier 4, one of the least developed areas in the District. Rawreth has a population of 812 people disparately spread having its own unique rural character pleasant country lanes inter dispersed by high quality agricultural land separated by traditional hedgerows, trees, and an undisturbed quietness and peacefulness completely contrary to the urban area of Rayleigh and Hockley. The CS states that additional development within tier 4 is considered unsuitable, contrary to Paragraph 4.10 of the CS. Rawreth has very few services and poor access to public transport such that car dependency is high.

2.1 The Council's vision is that new sustainable, residential developments are planned and are well related to infrastructure, community facilities, and play space. Notwithstanding this the Parish are concerned that sites within the urban area seemed to have been overlooked or dismissed in the SHLAA at the cost of the release of unnecessary green field land.

2.2 Further, despite the rural nature of Rawreth, the District Council is seeking to direct the highest portion of the rural housing development into the Parish with the most significant loss of Green Belt land and, it appears, very little analysis or justification is provided. There also appears to have been little analysis and comparison of the seven significant urban extensions which pre-determines that

land North of London Road Rayleigh should be required to accept at least 550 new dwellings.

2.3 Further, the CS and the draft LDF allocations document, is remarkably thin in its justification to recommend the redevelopment of the Parish's Industrial Estate, referred to in Policy H1 and in the Key Diagram. The compensation appears to be to release further employment land elsewhere that is even less sustainable within the heart of the Green Belt.

2.4 It is therefore very difficult for the Parish to be convinced that the suggested locations for housing growth are the most appropriate when there appears to be a total lack of evidence base and spatial planning. Indeed for both areas earmarked for housing development and redevelopment of the industrial estate, there is a substantial distance between key public transport exchanges and primary services.

2.5 It is highly unlikely that the many of the criteria listed at policy H2 of the CS, which should serve to support the sites will be met. Having regard to the listed criteria the two sites are isolated by distance from the existing centres, facilities and services. There is little in the way of existing infrastructure. Principal roads are highly congested. Our letter of the 25th October page 2 fully examines this issue. We seek clarification as to the County Surveyor's views on how such large developments will affect the existing strategic routes and whether any work has been done to assess the level of Local highway capacity and infrastructure improvements referred to at Appendix H1. Further, whether evidence gathering has been undertaken to assess the effects these two developments will have on the defined

strategic routes rather than just the local area. Such analysis should have examined the capacity of roundabouts at the A127, A1245 and A129 London Road. Then whether the development would still be viable and deliverable given these effects.

2.6 The location of the two sites means that people will be highly dependent on the motor vehicle at a time, late in the housing trajectory for the District, when dependency on the car should be falling for future sustainable developments.

2.7 Part of the land north of London Road is within Flood zone 3 which has a high risk of flooding. The site north of London Road is of high agricultural value and no reference is made to this. Finally, the Parish has serious concerns that the release of this level of land north of London Road flies in the face of the Council's ambitions to avoid the coalescence of neighbouring settlements. As set out in our letter of the 25th October, the development of this site with this level of erosion at the gateway entrance to Rochford will be adversely harmful to the countryside setting of Rawreth Parish.

2.8 Members have also raised specific concerns in the letter dated 25th October in relation to the Gypsy and Traveller Accommodation, page 3 of the letter refers. The evidence produced to support the single-issue review on Gypsy and Travellers, made it clear that travellers wished to be located adjacent to urban areas and close to services. The site advocated in the CS is remote, adjacent to a very heavily trafficked road and is highly visible from medium and long views. In conclusion it is totally inappropriate.

Conclusion

3.0 The Parish remains concerned that the drafted CS is ineffective, the evidence base is limited, and the analysis of the sites within the Rawreth Parish and the comparison of these against the other residential neighbourhoods being promoted is limited. The CS appears to lack a clear spatial vision or strategy for the District. The Parish concludes that the CS should not be approved, the Council should not be invited to undertake additional work, but the inspector should conclude that the document is unsound and that it be withdrawn.

The inspector is respectfully asked to have regard to these comments and the comments made in the Parish letter dated 25 October 2009.