

Firstplan



ROCHFORD CORE STRATEGY

**HEARING MATTER 4:
EMPLOYMENT AND ECONOMIC
DEVELOPMENT
18TH MAY 2010**

**STATEMENT
BY
STOLKIN & CLEMENTS (SOUTHEND)
LLP**

ROCHFORD CORE STRATEGY

POLICY ED4

**STOLKIN AND CLEMENTS
(SOUTHEND) LLP [9891]
REPRESENTED BY FIRSTPLAN
[8501]**

REPRESENTATION 16201

STATEMENT

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SECTION 1: INTRODUCTION

- 1.1 Firstplan has been instructed by Stolkin & Clements (Southend) LLP (S&C) to provide a statement in relation to Hearing Matter 4 (Employment and Economic Development) for the draft Rochford Core Strategy (18th May 2010).
- 1.2 Our clients own land known as Tithe Park, which is a site of 35 hectares, and which lies immediately to the north of the existing urban edge of the Borough of Southend-on-Sea, and is bounded to the north by Poynters Lane. The site is available, deliverable, and suitable for development. It is owned solely by our clients and can be brought forward for development at short notice. To our knowledge there are no major obstacles to development of the site, which is currently in an agricultural use. A site location plan is attached as appendix 1.

APPENDIX 1

- 1.3 This statement clarifies S&C's position in relation to the Employment and Economic Development issues raised in the Core Strategy, and explains why the draft plan is unsound as it is currently drafted, and the changes S&C propose to make it sound.
- 1.4 S&C have also made representations to Hearing Matter 2 – location and supply of new homes. Our clients believe that Tithe Park is most suited to residential development. However, in the event that this is considered inappropriate, the site can alternatively provide for a mix of residential and employment uses, or solely employment uses.
- 1.5 Relevant background information is provided in Section 2. Section 3 sets out our clients response in relation to the issues raised by the Inspector in the Pre-Examination meeting. Section 4 sets out why S&C considers the Plan to be unsound, and Section 5 provides our conclusions.



SECTION 2: BACKGROUND INFORMATION

- 2.1 The Tithe Park site is currently identified in the Allocations DPD Discussion and Consultation Document (Regulation 25, February 2010) as options E23 and E24 (2 of 6 options in total) for a new strategically located employment park to the south of Great Wakering. An extract from this document is provided at Appendix 2.

APPENDIX 2



SECTION 3: HEARING MATTERS TO BE DISCUSSED IN RELATION TO THE CORE STRATEGY

- 3.1 As suggested by the Inspector, we have specifically addressed the issue raised by her following the Pre-Hearing Meeting on 24th March 2010.
- a) **Will the Core Strategy ensure that sufficient land is available to meet the additional jobs required by the RSS in the most appropriate locations?**
- 3.2 Draft Policy ED4 explains that some industrial land will be provided in proximity to Great Wakering to provide local employment and to mitigate the loss of the Star Lane Industrial Estate to residential development. It follows that draft Policy ED4 will contribute to ensuring that sufficient land is available to meet the jobs required by the RSS.
- 3.3 We understand that it is not the role of the Core Strategy to allocate specific sites for employment. However, it is important that a clear strategy is set out which will allow a subsequent site allocations DPD to readily identify the land needed without having to re-visit strategic considerations.
- 3.4 The term “South of Great Wakering” is ambiguous. It could include our clients site ‘Tithe Park’. However, this is unclear, and we suggest the description is adjusted to allow our clients site to be assessed.
- 3.5 Tithe Park is identified as two of six options in the Allocations DPD (see appendix 2). In our client’s view that Tithe Park is the most sustainable options when considered against the other alternatives. Although we would anticipate the employment land being located to the west of the Tithe Park site, adjoining Southend and not to the north as indicated in the Allocations DPD.
- 3.6 By virtue of its location, the development of Tithe Park for employment purposes will have a lesser impact on the landscape and openness of the green belt than the other options around Great Wakering, because Tithe Park adjoins Southend to the south and west, and Poynters Lane to the north. Defensible green belt boundaries can be provided whereas the other potential sites are more open in aspect and this development could therefore have a greater impact on the green belt.



Firstplan Statement on behalf of Stolkin & Clements (Southend) LLP

- 3.7 Furthermore the other potential sites are situated in close proximity to the Local Wildlife Site at Great Wakering, whereas Tithe Park is some distance from this.
- 3.8 Local shops and services are within easy distance of Tithe Park and can provide services for prospective employees. These include the amenities at Great Wakering (Co-op supermarket, pubs, restaurants etc.) and the shopping and associated facilities at the Asda superstore, Southend.
- 3.9 Residents of Great Wakering will be easily able to access the site as it is located within a c.800 metre walk (10 minutes). However, the site will also be more accessible to those commuting from outside Great Wakering by public transport because Shoeburyness Railway Station is closer to Tithe Park than Great Wakering, cycling, and there are bus stops situated approximately 50 metres from the north west corner of the site.
- 3.10 Given the ambiguity of the term 'South of Great Wakering' the wording of Policy ED4 should be amended to ensure that the employment land is provided in the most appropriate location.



SECTION 4: SOUNDNESS OF CORE STRATEGY

4.1 For a DPD to be sound, it should be justified, effective, and consistent with national policy.

4.2 As currently drafted, Policy ED4 is not justified, effective or consistent with national policy.

(i) Justified

4.3 For the Policy to be sound it must be capable of being justified, and PPS12 advises that for a plan to be justified, it must be founded on a robust and credible evidence base, and it should be the most appropriate strategy when considered against reasonable alternatives

Robust and credible evidence base

4.4 The need to provide Employment Land is justified in the RSS and the proposed policy is supported by the Employment Land Study.

4.5 However, there appears to be no analysis of the types of site which may provide for the replacement employment land to the south of Great Wakering and therefore the Core Strategy is not founded on a robust and credible evidence base.

Most appropriate strategy when considered against reasonable alternatives

4.6 The Policy is not clear where the land to the 'South of Great Wakering' will be located. It would therefore be a more appropriate to provide a clearer description in this policy.

(ii) Effective

4.7 Paragraph 4.44 of PPS12 states that Core Strategies should be effective. This means that they should be deliverable, flexible, and capable of being monitored.

4.8 To be deliverable the Core Strategy policies will need to provide a clear strategy which allows the subsequent site allocations DPD to readily identify the land needed without having to re-visit strategic considerations. Policy ED4 as currently drafted is too broad and is therefore not effective.



(iii) Consistent with National Policy

4.9 To be considered sound the Core Strategy must comply with Government advice. The more sustainable the proposed development, and the less impact there is on open countryside, the more the proposals for employment and economic development will comply with the views of Government.

4.10 In particular, the Core Strategy inconsistent with the following National Policy:-

PPS1 – Without more precise wording it is not certain that employment development will protect and enhance the quality, character and amenity value of the countryside and urban areas; and reduce the need to travel as set out in Paragraphs 17 and 27 of the PPS.

PPG2 – Paragraph 1.5 sets out five purposes of Green Belts:- checking unrestricted sprawl; preventing towns from merging; safeguarding from encroachment; preserving the setting and special character of historic towns; and assisting in urban regeneration. Without more precise wording it is not certain that employment development will comply with this policy guidance.

PPG13 – Paragraph 4 sets out the Government’s objectives to promote more sustainable transport choices, promote accessibility to jobs, shopping and leisure facilities and services by public transport, walking and cycling and reduce the need to travel. Without more precise wording it is not certain that employment development will comply with this policy guidance.

(iv) Proposed Changes to make the Core Strategy Sound

4.11 Alter the term ‘South of Great Wakering’ to ‘South of Great Wakering and north of the boundary with Southend-on-Sea Borough Council.



SECTION 5: CONCLUSIONS

5.1 We conclude that:

What part of the Core Strategy is unsound?

5.2 Policy ED4

Which soundness test(s) does it fail?

5.3 Justified, effective and consistent with National Policy.

Why does it fail?

5.4 The policy does not provide detailed enough guidance in relation to 'South of Great Wakering' to guide the Allocations DPD appropriately.

How can the Core Strategy be made sound?

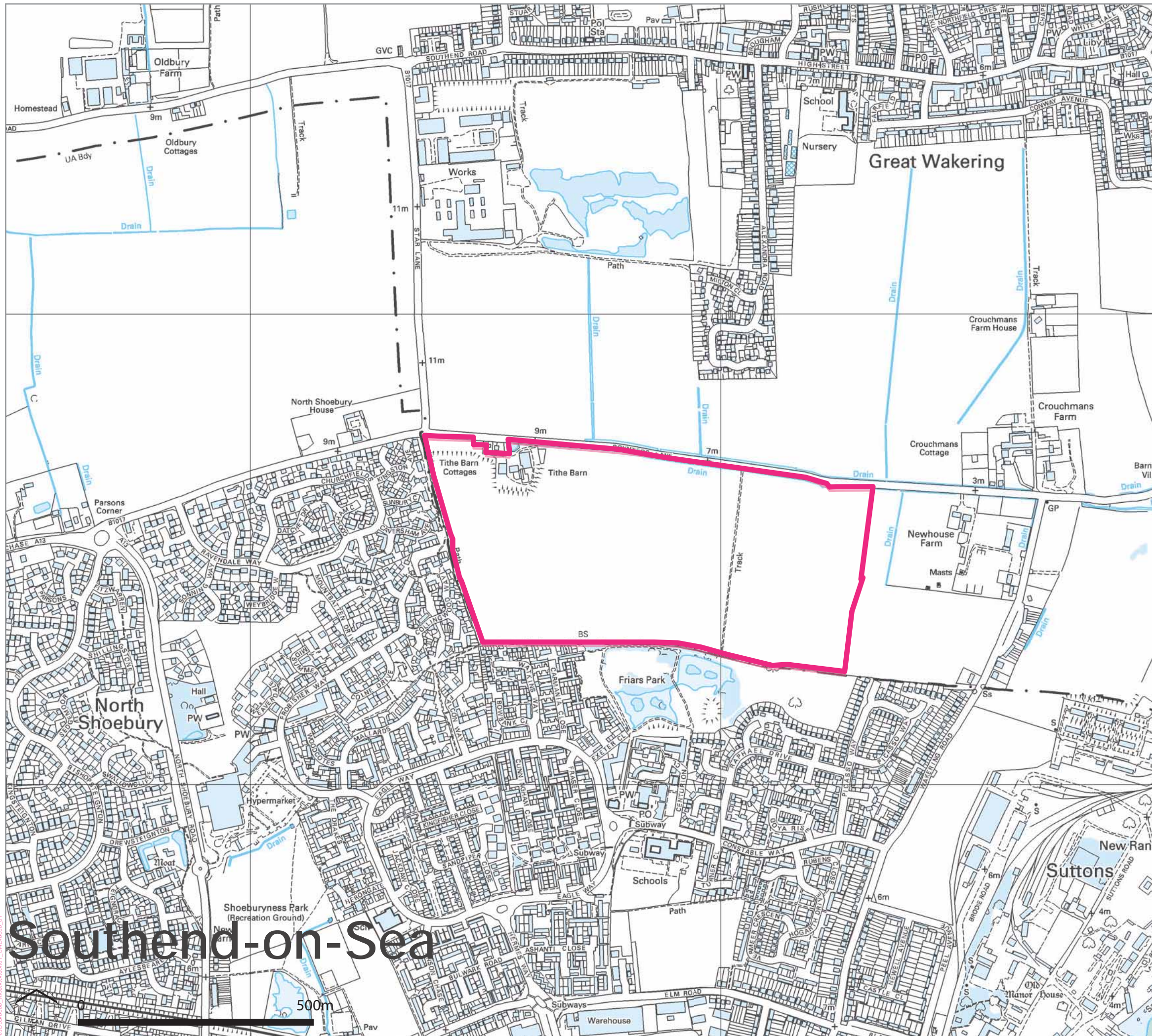
5.5 By amending the wording to provide a clearer description of the location of the proposed employment land.

What is the precise change/wording that is being sought.

5.6 Alter the term 'South of Great Wakering' to 'South of Great Wakering and north of the boundary with Southend-on-Sea Borough Council.



APPENDIX 1



LEGEND

Site boundary

REV.	DESCRIPTION	APP. DATE

LDĀDESIGN

PROJECT TITLE
SOUTHEND-ON-SEA

DRAWING TITLE
Red Line Boundary

ISSUED BY **London** T 020 7467 1470

DWG.NO 2714_001

DATE 24/01/2009

SCALE@A3 NTS

STATUS DRAFT

DRAWN	RS
CHECKED	MM
APPROVED	MM

No dimensions are to be scaled from this drawing.
All dimensions are to be checked on site.
Area measurements for indicative purposes only.

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Southend-on-Sea

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APPENDIX 2

South of Great Waking

The Council will allocate land to the south of Great Waking for a new strategically located employment park. This new employment facility will be capable of accommodating businesses displaced from Star Lane Industrial Estate.



Option E19 is north of Poynters Lane and East of Star Lane. The land is currently arable and is adjacent to arable land to the west and south, with a residential dwelling to the south. There are residential dwellings to the west of the site. The site can be accessed via Star Lane and / or Poynters Lane. The proximity of the site to residential development and the capacity of the surrounding road network should be considered.



Source: Google Maps
Approximate site size: 6Ha

Option E20 is as E19 although extends further south.



Source: Google Maps
Approximate site size: 14 Ha

Option E21 is as E19 although concentrated to the east of the site. This has the potential to have a greater impact on the residential settlement to the east of the site.



Source: Google Maps
Approximate site size: 9 Ha

Option E22 is as E19 although concentrated to the north of the site. This is adjacent to a smaller proportion of residential development to the east of the site and would also result in less impact on Poynters Lane.



Source: Google Maps
Approximate site size: 11 Ha

Option E23 is south of Poynters Lane Great Waking. The site abuts the residential development of Southend Borough to the west and south, and agricultural land lies to the north and east of the site. To the north of the site lies a residential dwelling. The relationship between an employment site at this location and Great Waking would be weak. The site is detached from the main settlement of Great Waking and is instead located at the boundary of residential settlement within the neighbouring Borough, Southend-on-Sea, and as such is more likely to be seen as a part of that community, than the community of Great Waking.



Source: Google Maps

Approximate site size: 23 Ha

Option E24 is as E23 with the exception being that the site does not extend as far south. The relationship between an employment site at this location and Great Waking would be weak. The site is detached from the main settlement of Great Waking and is instead located at the boundary of residential settlement within the neighbouring Borough, Southend-on-Sea, and as such is more likely to be seen as a part of that community, than the community of Great Waking.

Such an allocation projects into the open countryside and would lead to weak Green Belt boundaries, with Green Belt immediately to the north, east and south.



Source: Google Maps
Approximate site size: 12 Ha