

Our Ref: JRF/SPP/10.1380

Your Ref: 16161 & 16163.

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Local Service - Nationwide

18 January 2011

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Dear Mr Hollingworth

**Response on behalf of West Rochford Action Group
Inspector's Matters and Issues for the Resumed Examination February 2011 arising from
Changes to Core Strategy Submission Document
Consultation Period Expiring 18 January 2011**

Smart Planning represent West Rochford Action Group (WRAG). Their original validly made objections were given the references 16161 & 16163. WRAG were represented by Smart Planning on Day 2 of the Examination on 12 May 2010 for which written submissions were produced, and we subsequently made representations, in a letter dated 28 June 2010 to the Council's Audit Trail of activity. Smart Planning responded to the proposed changes to Core Strategy Submission Document, October 2010 in a letter dated 26 November 2010.

This current response should be read in conjunction with all the responses made to date and with which these comments are consistent.

Response will be made using the same headings and paragraph numbers as set out in the document entitled 'Matters and Issues for the resumed examination, February 2011'.

"1) General"

The intention to abolish regional spatial strategies, the impact of this upon the East of England plan and the relationship of both these matters to the High Court judgment on the Cala Homes case is not fundamental to WRAG's objections. These objections deal with matters of principle rather than the precise quantum of development.

...continued

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"2) Location and supply of new homes"

- a) The revised CS does not meet the requirements of PPS3 having particular regard to paragraph 33 wherein it states

'A Sustainability Appraisal of the environmental, social and economic implications, including costs, benefits and risks of development. This will include considering the most sustainable pattern of housing, including in urban and rural areas.'

WRAG has demonstrated that the LPA's Sustainability Appraisal of broad locations for housing is flawed in a number of areas. WRAG has further demonstrated that the LPA's decision to defer the consideration of detailed information and studies at a site level invalidates the choice of broad locations. Consequently the broad locations chosen are not based upon a proper consideration of 'the most sustainable pattern of housing'.

The same is also true of paragraph 55 to PPS3 which logically expects the identification of specific sites to follow on from the broad locations. If the base line assessments of broad locations have not been undertaken then the adoption of these in a Core Strategy will not lead to the choice of the most sustainable pattern of housing when specific sites are chosen. We already know this to be true from what the LPA has published in its draft Allocations Development Plan Document (ADPD).

"2) Location and supply of new homes"

- c) Would the revised CS comply with the requirement in PPG2 that Green Belt boundaries should be revised only in exceptional circumstances.

WRAG has commented extensively on the LPA's failure to properly consider the character and long-term durability of the Green Belt boundary at West Rochford. These comments are not reiterated here but can be found in section 4.0 of WRAG's original written submission to the Rochford Core Strategy Examination.

The relevant extracts are paragraphs 2.6 to 2.11 in PPG2. The revised Core Strategy does not comply with paragraph 2.10 in that, for all the reasons stated previously, it does not take account of the need to promote sustainable patterns of development. The LPA has not done its ground work in understanding the relative sustainability of competitor sites and has not undertaken any character or sensitivity analysis of existing Green Belt boundaries. It therefore has no basis to understand the significance of changing the Green Belt boundary at West Rochford and therefore no ability to explain why a change in this location is better in sustainability terms than any other location

This concludes WRAG's submissions in this matter.

Yours sincerely



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DIRECTOR

c.c. Mrs A Henwood, Chairperson, WRAG