

Issue 2/BFR1 & SER9  
Inner London Group (9917)  
Christopher Wickham Associates (4961)

**EXAMINATION OF THE ROCHFORD ALLOCATIONS SUBMISSIONS  
DOCUMENT**

**HEARING SESSION AT 2PM ON TUESDAY 3<sup>RD</sup> SEPTEMBER 2013**

**HEARING STATEMENT ON BEHALF OF INNER LONDON GROUP**

**Issue 2 (Great Wakering): Are the allocated housing and employment sites (both brownfield and settlement extensions) justified, deliverable within the plan period and consistent with national policy?**

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**Town Planning Consultancy**

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### Policy BFR1 – Star Lane Industrial Estate

1. Inner London Group (ILG) owns the former brickworks site that comprises the southern section of the 'Star Lane Industrial Estate'. The brickworks site, which amounts to approximately 58% of the site area of BFR1, constitutes an area of concrete hardstanding. The use of the term 'Star Lane Industrial Estate' for the entire site of BFR1 is misleading as the northern developed section has the characteristics of an industrial estate while the southern former brickworks section was a separate use that did not previously form part of the estate. In this statement, the term 'industrial estate' is used to describe the northern section of BFR1.
2. ILG support the allocation of BFR1 for housing but consider the policy to be over-prescriptive in a number of respects. This statement responds to the Inspector's questions as follows:-

Q(i): Is the site selected justified when compared to other reasonable alternatives?

3. The allocation of BFR1 for residential use is justified because both portions of the site constitute previously developed land located outside the green belt, the re-use of which reduces the need for the release of land within the green belt. Redevelopment of each part of the site accords with the underlying sustainability objectives of the NPPF. Additional housing development at Great Wakering will also support local businesses.

Q(ii): Is the proposed development deliverable over the plan period having regard, amongst other things, to land ownership issues and infrastructure constraints?

4. The brickworks are cleared and available for development, and are in the sole ownership of ILG. The site is the subject of a current planning application (ref: 12/00252/FUL) for 116 dwellings with on-site open space and access

from Star Lane. The application has been the subject of extensive discussions with the LPA, Essex County Council (ECC) Highways and Design Officers, Natural England, and other agencies. The scheme has also been subject to viability testing, and is likely to provide 10% affordable housing and a range of S.106 contributions to enhance local infrastructure including contributions to highways, education, and play/youth facilities.

5. The HSE recently advised against the development on the grounds that the site is located close to a high pressure gas pipe line on the land to the west of Star Lane but has indicated that this advice would be lifted if slab protection works to the pipeline were implemented prior to the proposed development. ILG have agreed to these works, the cost of which will reduce the agreed land value within the earlier viability assessment.
6. Following the grant of planning permission, development is expected to commence promptly following the protection works associated with the gas pipe line. The allocation of site BFR1 for housing, in so far as it relates to the former brickworks section, is therefore considered to be deliverable.

Q(iii): Are the detailed site boundaries appropriate?

7. The detailed site boundary is correct in so far as it relates to the brickworks section of the site.

Q(iv): Is the detail about the form, scale and access and quantum of development appropriate having regard to policies in the Core Strategy?

8. With regard to capacity, BFR1 includes an expectation that the combined site could deliver 131 dwellings. A development of 131 dwellings would equate to 76 dwellings being provided on the former brickworks site on a pro rata basis. This figure, which is substantially less than that proposed by the current planning application, is considered to represent an under-use of the plot, and would certainly not be viable.

9. The Concept Statement within Policy BFR1 comprises a detailed brief for the development of the site. With the exception of public open space and play space requirements, the detailed requirements of the Concept Statement with regard to the form, layout and scale of development are broadly appropriate. In addition, requirements relating to SUDS, drainage and the protection of the adjacent Local Wildlife Site are consistent with the Core Strategy, and have been addressed in the current planning application.
10. However, the Concept Statement unnecessarily repeats Core Strategy Policies H4 and H6, and prescriptively requires full compliance with affordable housing, Lifetime Homes and accessible housing policies. There is no reference within BFR1 to the need for scheme viability to be taken into account, as recognised by these Core Strategy policies.
11. The requirement within BFR1 for associated infrastructure improvements, whether provided on-site or off-site, including improved flood defences, is consistent with Core Strategy Appendix H1.

Q(vi): Are the requirements for public open space and play space justified for brownfield sites given the likely development costs?

12. The Concept Statement lays down a series of prescriptive requirements relating to the form and layout of development across the site including specific quantitative requirements for public open space and play space (LAP, LEAP & NEAP). The Core Strategy does not set down specific standards of provision. The Concept Statement's specified public open space requirement (0.6ha for 87 dwellings) equates to 69 square metres of open space per dwelling excluding any provision for a LAP, LEAP or NEAP. In response to these requirements, a 'Statement of Open Space' (SOS) was submitted by ILG in support of the planning application, and is included as Appendix 1 to this Hearing Statement. The purpose of the SOS was to provide a planning justification for setting aside these aspects of BFR1 and in favour of the quantum and type of open space/play space proposed as part of

the application scheme. The contents of the SOS are directly relevant the issue under consideration at the Examination. The quantitative requirements of the Concept Statement in so far as they relate to open space and play space are considered unjustifiable for the following reasons.

13. First, Rochford is well served by an 'abundance' of natural and semi-natural green space (as confirmed in the Open Space Study 2009) although there may be a shortfall in the Foulness and Great Wakering ward. The SOS notes that even areas that are inaccessible (such as the adjoining Star Lane Pits Local Wildlife site) contribute to biodiversity and environmental quality as 'green lungs', and that the Open Space Study refers to plans to develop additional natural and semi-natural green space at Wallasea Island, a few miles north of Great Wakering.
14. Second, the SOS draws attention to Natural England's recommendation that natural green spaces should be at least 2 hectares (the smallest category of a hierarchy of five), and states that the brickworks site (3.36 hectares) is clearly too small to accommodate even this smallest category of green space. It is noted that in relation to Policy SER9, the Council expects the open space associated with the proposed development of 250 dwellings to comprise principally an area of 1.8 hectares in the single green belt location on the western edge of SER9a, well away from SER9b, in particular its south-eastern corner. In the case of SER9, the expectation is therefore for a large area of natural/semi-natural green space that is broadly consistent with the smallest size within the Natural England hierarchy.
15. Third, the requirement to incorporate a LEAP and a NEAP on the brickworks site is considered unreasonable. These types of play area can be satisfactorily provided centrally in Great Wakering at the Recreation Ground within reasonable walking distance of the brickworks site. LEAPs and NEAPs also require buffer zones (see SOS 2.12) that would further reduce the site's capacity to deliver a viable housing scheme.

16. Fourth, as the Concept Statement acknowledges, BFR1 may be developed in stages. This is, in fact, is highly likely. The brickworks site is available for development now but this is in contrast to the industrial estate which remains in use and is in multiple ownerships. The Concept Statement even envisages the possibility of staged development of the industrial estate (paragraph 2.29), and identifies the need to incorporate green buffers between residential and industrial uses. If, as expected, development comes forward in stages, the quantitative requirements for open space would presumably need to be apportioned to each stage on a pro rata basis even though a more co-ordinated 'cross-phase' provision might be preferable in accessibility and site layout terms. For example, a single open space that would serve the west of Great Wakering generally would be better located close to the northern boundary of the BFR1 site closer to existing housing than on the former brickworks site.
17. Finally, the prescriptive requirements for open space and play space would render development of the brickworks site unviable. ILG's acquisition and holding costs, allied to the restoration and decontamination costs associated with the brownfield industrial site, underline the need to make full and effective use of the land for housing. Planning and design standards such as parking and private amenity space requirements need to be met but a flexible, realistic and proactive approach to communal open space is required if much-needed new housing is to be delivered without further loss of green belt. The application scheme, incorporating 116 dwellings with 3 parcels of integrated open space, provides a reasonable balance of benefits in terms of affordable housing, on-site open space, full compliance with parking, highway and private amenity space standards, and contributions to off-site infrastructure. The proposal has been subject to a viability assessment that has been agreed with the Council's independent consultants. Any reduction in unit numbers would reduce affordable housing and/or off-site contributions, and would quickly render the scheme unviable. At 116 dwellings, the application scheme would need to provide 0.8 of a hectare of on-site open space to meet the requirements of BFR1. The Concept Statement envisages

a development of 76 dwellings on the brickworks site but this would self-evidently reduce the quantum of development to well below its viability threshold.

[Question for specific site – Great Wakering]

Q(i): Is it realistic to anticipate that existing industrial uses would re-locate to the new employment site?

18. There is uncertainty about when existing industrial uses would relocate from the industrial estate, and presumably relocation would require some form of compulsion or incentive. ILG have no ownership interest in the industrial estate but the application scheme for the former brickworks site incorporates a visual and acoustic buffer to the boundary between these two sections of the site. Relocation of the industrial uses is therefore not a pre-requisite for the successful redevelopment of the former brickworks site.

Summary response to Inspector's questions

19. The selection of BFR1 is entirely justified when compared to reasonable alternatives, principally because of its brownfield status and the associated reduced pressure to release green belt land. The site is identified as a location for housing within the Core Strategy.
20. The brickworks section is deliverable over the plan period. It is in single ownership, and the scheme will deliver associated infrastructure improvements. The application is evidence of the developer's intent.
21. The site boundaries are correct. The detail regarding the form, scale, access and quantum of development is not entirely appropriate. In order to achieve viability and maximise contribution to housing need, a higher quantum of development is appropriate (as evidenced by the current planning application). Policies for affordable housing, Lifetime Homes standards, and accessible housing need to be applied flexibly in line with Core Strategy

policies. The requirements for a high standard of design and layout, site decontamination, sustainable design and construction, boundary buffer treatment, potential accessibility to adjacent land, protection of the adjacent Local Wildlife Site, and off-site infrastructure enhancements, are acknowledged.

22. The prescriptive requirements for open space and play space are not justified given the developments costs of this relatively small brownfield site. Such requirements might be justifiable on larger, greenfield sites where layout and provision can be strategically planned and where site acquisition and preparation costs are typically lower.
23. There is uncertainty over the relocation of industrial uses from the northern section of BFR1 but this does not prejudice the development of the southern section of the site.

#### Conclusion on soundness of BFR1

24. ILG consider that BFR1 is sound in a number of respects. However, its overly prescriptive quantitative requirements are considered to render the policy unsound as follows:-
  - It has not been positively prepared because the prescriptive open space requirements would be better met, in the case of a relatively small and peripheral site of this kind, through improvements to/provision of larger and more accessible off-site facilities in Great Wakering;
  - It is not justified because its prescriptive approach would obstruct development whereas a more flexible approach would facilitate the delivery of the site for new housing;



- It is not effective because it would prevent the delivery of a brownfield site identified within the Core Strategy as a priority location for new housing;
- It is not consistent with national policy that seeks a flexible, proactive and realistic approach to plan-making and decision-taking, and because the overly prescriptive approach would stifle the sustainable development of a brownfield site. Paragraph 173 of the NPPF states that *'...the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened'*.

25. Policy BFR1 could be made sound by removing the need for this site to deliver natural and semi-natural green space, or a LEAP or a NEAP, none of which is appropriately located here for the reasons set out in the SOS. Furthermore, re-wording should emphasise the need for the realistic and flexible application of policy and standards having regard to the brownfield status of the site and the need to ensure that viability is not threatened. Requirements for (i) the provision of affordable housing (paragraph 2.13), and (ii) compliance with Lifetime Homes Standards and wheelchair accessibility (paragraph 2.14), and (iii) amenity open space and a LAP (paragraphs 2.16, 2.17 & 2.26), should be caveated by the words *'subject to such provision not threatening the viability of the development'*.

Policy SER9

Q(i): Is the site selected justified when compared to other reasonable alternatives?

And

Q(ii): If either Sites SER9a or 9b are found unsound, would the land west of Alexandra Road included in Option WGW3 be sound?

26. Policy SER9 comprises two unrelated and unconnected areas of land (SER9a and SER9b) on the west side of Great Waking.
27. ILG consider that the selection of green belt site SER9a is not justified for housing release because, when compared to a reasonable alternative available in West Great Waking on land to the west of Alexandra Road, development would harmfully intrude into open countryside, would fail to provide a defensible green belt boundary, and would be in a relatively unsustainable location some distance from the centre of Great Waking.
28. Plot SER9a is located behind existing frontage development to the west of Little Waking Road. Its long western boundary faces open countryside (to be used to provide open space). Development in this location would create a long continuous flank of housing, aligned with existing settlement boundaries to the north and south, that would harm landscape character by virtue of an intruding urbanising impact. By contrast, the existing 'indented' settlement boundary provides visual relief as well as a defensible boundary based, principally, on the rear boundaries of frontage plots and a road. Development of this plot would be likely to lead to future pressure for further westward expansion towards a more defensible highway boundary. Furthermore, substantial new development in this green field location would be remote from services in the centre of Great Waking.

29. Plot SER9b lies to the rear of the High Street, and its northern and western boundaries are formed by established residential and industrial development. Its southern boundary is defined by the Local Wildlife Site. These are strong, defensible boundaries that enclose the site without exposure to open countryside. However, the eastern boundary of SER9b is defined by little more than an ownership boundary with land to the west of Alexandra Road. The latter is owned by ILG (the "ILG land"), and was one element of Option WGW3. The enlargement of SER9b to include the contiguous ILG land would represent a logical extension of the developable area because the ILG land has clearly defined boundaries formed by existing housing to the north, east and south, and by the Local Wildlife Site to the west. The ILG land is also centrally located within Great Wakering with direct potential access to High Street.
30. The resulting combined site, which would have an area of approximately 12 hectares, would be visually and physically enclosed by the existing 'arc' of development along Star Lane, High Street and Alexandra Road, and would have no potential for future southward expansion because its boundary to the green belt would be defined entirely by the Local Wildlife Site. By virtue of its existing degree of enclosure, development of the ILG land would have little material impact on wider landscape quality or the openness of the green belt. The ILG land is also not subject to particular ecological or other constraints although a buffer zone with the Local Wildlife Site could be appropriate.
31. The selection of site SER9a is therefore not considered to be sound because it is intrinsically unjustified in terms of sustainability and impact on the landscape, and would not be consistent with national policy on the protection of the green belt and provision of long-term defensible boundaries. It is also not justified, and is therefore not sound, because the merits of the reasonable alternative decisively outweigh the case for release of SER9a. The ILG land is directly associated with SER9b, occupies a sustainable location, and in association with SER9a will result in a fully defensible green belt boundary and little material impact on wider landscape quality.

32. Policy SER9 should be changed by way of an extension of SER9b to include the ILG land, and by the omission of SER9a.

(Length: 2973 words)

**CHRISTOPHER WICKHAM BA MRTPI**  
**August 2013**

Issue 2/BFR1 & SER9  
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**HEARING SESSION AT 2PM ON TUESDAY 3<sup>RD</sup> SEPTEMBER 2013**

**APPENDIX TO HEARING STATEMENT  
ON BEHALF OF INNER LONDON GROUP**

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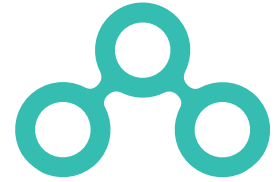
Appendix 1

Statement of Open Space Provision (May 2013) by Steven Abbott Associates in support of Planning Application 12/00252/FUL for site of former Star Lane brickworks, Star Lane, Great Wakering.

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**SITE AT FORMER STAR LANE BRICKWORKS, STAR LANE,  
GREAT WAKERING, ESSEX**

**STATEMENT ON OPEN SPACE PROVISION FOR PROPOSED  
RESIDENTIAL DEVELOPMENT ON BEHALF OF THE APPLICANTS**

LPA Ref:  
12/00252/FUL

May 2013



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## **1. INTRODUCTION**

- 1.1 This statement has been produced on behalf of the applicants, Inner London Developments (Wakering) Ltd, in relation to the provision of open space within the proposed residential redevelopment of the former Star Lane Brickworks as shown in the submitted drawings
- 1.2 At present, there is a tension between on the one hand, the amount and type of open space proposed by the applicant and shown in the layout drawings and, on the other hand, the amount and type of open space which is required by Policy BFR1 of the Rochford District Council Local Development Framework Allocations Submission Document. This policy contains a concept statement for the whole of the Star Lane Industrial Estate site, of which the current application site makes up around 58%.
- 1.3 This statement will examine the basis of the concept statement's open space requirement, which, it is contended, is mis-guided and flawed and will then clarify why the current level and type of on-site provision, supplemented by a financial contribution towards the improvement of existing nearby off-site facilities, is appropriate.



## 2. POLICY CONTEXT

- 2.1. The planning policy context relevant to open space matters in Rochford District is provided at a national level by the National Planning Policy Framework (NPPF) and at a local level by the saved policies of the adopted Rochford District Replacement Local Plan (2006), the adopted Rochford Core Strategy and the emerging Rochford District Council Local Development Framework Allocations Submission Document (hereafter referred to as the allocations document). The Open Space Study produced by the District Council in 2009 (published in 2010) provides the evidence base for open space matters.
- 2.2. **National Planning Policy Framework** – Paragraph 73 notes that *“access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Planning policies should be based upon robust and up to date assessments of the needs for open space ..... and opportunities for new provision.”*
- 2.3. **Rochford District Replacement Local Plan** - A number of the policies within the adopted local plan have been saved and will remain in place until all relevant Development Plan Documents are adopted in due course. Policy LT4 (Public Open Space) deals only with the delivery of public open space in areas outside Great Wakering and is therefore not relevant to the current application.
- 2.4. Policy LT5 (New Public Open Space) relates only to informal open space and establishes a set of criteria which all new informal open spaces are required to meet. Policies LT6 (Private Open Space) and LT7 (Safeguarding Open Space) seek to give protection to both types of open space.
- 2.5. Policies LT9 (Children’s Play Spaces) and LT10 (New Play Space Provision) seek to expand and improve the available children’s play areas in the district, either on site or off-site via financial contributions. Particular attention is to be paid to the needs of older children.
- 2.6. Policy LT16 (Dry Pits) seeks to promote the recreational use of former mineral workings in appropriate circumstances, although the policy states that SSSI’s and nature

conservation sites are not normally considered to be suitable for recreational after-use. This is not entirely true as some such sites can be suitable for allocation and use as natural and semi-natural greenspaces, which is one of the former PPG17 types of open space.

- 2.7. Policy NR7 (Local Nature Reserves and Wildlife Sites) safeguards the nature conservation value of such sites.
- 2.8. **Rochford Core Strategy** - Policy CLT5 of the adopted Core Strategy requires the provision of new public open space to accompany additional residential development, having regard to local current and projected future need. No standards of provision are provided within the Core Strategy.
- 2.9. **Rochford District Council Local Development Framework Allocations Submission Document** - The Concept Statement within Policy BFR1 of the allocations document requires the provision of *“at least 0.6 ha of public open space”* across the total allocated site of 5.8 ha. This is stated to be based upon the provision of 87 dwellings and would be increased if the site accommodates more than 87 dwellings. Although it is not explicitly stated as such, it appears to be the intention of the policy to require every dwelling on the site to deliver 69m<sup>2</sup> of public open space. Assuming that each dwelling accommodates 2.3 residents, this would equate to the provision of 3 ha of open space per 1000 population (69 ÷ 2.3 = 30m<sup>2</sup> per person and 30m<sup>2</sup> x 1000 = 30,000m<sup>2</sup> or 3 hectares). This is the standard of provision established in the Open Space Study for natural and semi-natural greenspace (see below).
- 2.10. Based upon this standard of provision, the current application for 116 dwellings would require fractionally over 0.8 ha of natural and semi-natural open space, or almost 25% of the total site area.
- 2.11. In addition to natural and semi-natural greenspace, the concept statement to Policy BFR1 requires other forms of open space to be provided on site. Amenity open space is to be provided and at least one local area for play (LAP). Developers are also required to *“look to provide local equipped areas of play (LEAP) and/or neighbourhood equipped*

*areas for play (NEAP) which require a minimum of 0.04 ha and 0.1 ha respectively.”* The design of the play areas is to follow the principles established by Fields in Trust (formerly the National Playing Field Association) and Play England.

- 2.12. It should be noted that the Fields in Trust principles for the provision of play areas requires active play areas to be separated from any adjacent housing by a buffer zone of 5m for a LAP, 10m for a LEAP and 30m for a NEAP. Thus, if all of these additional types of open space are also to be provided on-site, this would necessitate a significant reduction in the quantity of housing which could be provided, over and above the 25% which the natural and semi-natural greenspace provision would require.
- 2.13. Policy OSL1 of the allocations document allocates all areas of open space identified in the Open Spaces Study (2009) as such and affords them protection from other competing uses.
- 2.14. Policy OSL2 identifies new residential developments within which additional public open space is to be provided, including land at the Star Lane Industrial Estate, Great Wakering (Policy BFR1), which contains the current application site.
- 2.15. The allocations document has reached the submission stage and an Examination in Public (EIP) is to be held later this year to consider any outstanding objections to the soundness and legality of the document. It should be noted that the applicant's agent has submitted objections to Policy BFR1 on the basis that the policy is too prescriptive and its requirements are unreasonable. These will be considered by a Planning Inspector at the EIP in due course.
- 2.16. The Open Spaces Study 2009 (which was actually published in January 2010) seeks to identify existing areas of open space in the district and to establish new standards of open space provision, together with accessibility standards. The document has regard to the former PPG17 and its companion guide, *Assessing Needs and Opportunities: A Companion Guide to PPG17*, which still remains in force.

- 2.17. The Open Space Study (OSS) notes that PPG17 recognised that open space *“should be taken to mean all open space of public value, including not just land, but also areas of water such as rivers, canals, lakes and reservoirs which offer important opportunities for sport and recreation and can also act as a visual amenity.”*
- 2.18. Table 1.1 of the OSS provides a typology of open space which is taken from PPG17. This identifies the primary purpose of natural and semi-natural greenspace including woodlands, to be *“wildlife conservation, biodiversity and environmental education and awareness.”*
- 2.19. In the methodology section of the OSS (pages 15-17), it is stated that the assessment considers *“predominantly Council-owned or managed green spaces and other green spaces which are publicly accessible and are available for community use. Private facilities and areas of open space will be included, as appropriate.”*
- 2.20. The concept statement within Policy BFR1 notes that a Local Wildlife Site (LWS) is located to the east of the allocated site and that a green buffer should be provided between the development and the LWS. A Local Wildlife Site Management Plan is to be prepared, in consultation with relevant bodies. However, the site is not within the ownership or control of the current applicants and therefore such a plan would need to have, at the very least, input from the site owners. It is understood however, that co-operation from the owners of the LWS is unlikely.

### 3. CONSIDERATIONS OF ISSUES

3.1. It is accepted that the adopted core strategy requires new public open space to be provided to accompany additional residential development. What is not accepted is the amount and type of open space which is required by Policy BFR1 of the emerging allocations document, which is the subject of an outstanding objection from the applicant's agent.

3.2. The Open Space Study identifies an *"abundance"* of natural and semi-natural greenspace in the district as a whole, but a shortfall in the Foulness and Great Wakering ward. It appears that the local planning authority sees the application site as a convenient means of seeking to begin to address this existing shortfall in provision. This approach is, it is contended, incorrect for the reasons set out in the following paragraphs.

3.3. Firstly, the creation of relatively small, free standing areas of natural and semi-natural greenspace does not accord with the relevant guidance of the responsible advisory bodies. Natural England, for example, recommends, in its 2010 document 'Nature Nearby' – Accessible Natural Greenspace Guidance (ANGSt), that *"everyone wherever they live, should have an accessible natural greenspace:*

- *At least 2 hectares in size, no more than 300m (5 minutes walk) from home;*
- *At least one accessible 20 ha site within two kilometres of home;*
- *One accessible 100 ha site within 5 km of home; and*
- *One accessible 500 ha site within 10 km of home; plus*
- *A minimum of one hectare of Statutory Local Nature Reserves per 1000 population."*

3.4. The application site is clearly too small to accommodate even the lower end of this hierarchy of natural greenspace. Although the site is adjacent to the Star Lane Pits Local Wildlife Site, the two sites are in separate ownership and there is no prospect of any

physical links between the two sites. As noted in the applicant's ecological assessment, the submitted layout shows that there would be a buffer between the LWS and the nearest dwellings in the form of the gardens to the dwellings on the eastern boundary. Such a buffer would be more effective than attempting to create a new small natural greenspace on the LWS boundary, which would inevitably lead to temptation for unauthorised access onto the LWS, particularly by children.

- 3.5. The schedule of all designated natural and semi-natural greenspaces in Appendix A of the Open Space Study shows that all but one of the 20 sites are over 2 ha in area. The OSS also notes that *"There is an abundance of natural and semi-natural greenspaces throughout the District, some of which are available for use by the public and some of which are privately owned or managed. PPG17 recognises that the green areas which are inaccessible to the public contribute to local biodiversity and environmental quality through acting as important 'green lungs.'"* It goes on to note that *"It is impractical to audit all of the greenspaces, many of which are protected by international, national or local designations.* The Study also refers to plans to develop additional natural and semi-natural greenspace to the east of the District at Wallasea Island (a few miles north of Great Wakering) and elsewhere and notes that opportunities to improve the accessibility to existing natural and semi-natural greenspaces should be considered.
- 3.6. Against this background of *"abundance"* and plans to provide additional natural and semi-natural greenspaces, it is therefore clear that the actual level of provision of natural and semi-natural greenspace is, in reality, a great deal higher than what is shown in the Open Space Study. It is consequently somewhat surprising that the study concludes that the minimum provision of this type of open space for the District should be increased from the existing 2.93 ha per thousand population to 3.00 ha per thousand and that this should be attained by the provision of small areas of natural greenspace within residential developments such as the current application site.
- 3.7. Whilst the companion guide to PPG 17 does not recommend any standards of provision or minimum sizes for natural and semi-natural greenspaces (or any other types of open space), it does say that *"Opportunities for doing this can really only be identified on a site*

*basis, through phase 1 habitat surveys and biodiversity audits. Broadly speaking, planning for new natural greenspace in established urban areas has to be largely opportunity-led.*" This suggests that local authorities should be seeking opportunities to improve access to existing and larger areas of natural greenspace, rather than trying to create them in small pockets on brownfield sites.

- 3.8. The ecological assessment submitted with the application notes that *"The majority of the application site comprises hardstanding and recolonising ground, which are of negligible ecological significance. These habitats are to be lost to the development proposals."* It goes on to note that no specific mitigation measures are required for the loss of these habitats, although *"the replacement of extensive hardstanding with garden areas will be of significant biodiversity benefit overall."* Therefore, the *"opportunity-led"* approach of the PPG 17 companion guide would suggest that the application site is not one which should be considered for creating a natural or semi-natural greenspace.
- 3.9. Secondly, based upon the PPG17 companion guide and the Natural England guidance, the local planning authority would be better advised to address its apparent deficiency of natural and semi-natural greenspace in the Great Wakering area by seeking to bring the adjacent Star Lane Pits Local Wildlife Site into greater public use. The site has all of the attributes of a natural and semi-natural greenspace apart from full public access. The 6.9 ha site has a public footpath to the south plus vehicular access and car parking and has formerly accommodated a fishing club.
- 3.10. Such an approach would appear to concur with the thoughts of both the local authority itself (as noted above in paragraph 3.5) and Natural England, which commented, as quoted within the applicant's ecological assessment, that *"the Star Lane Pits LWS and other open spaces in the vicinity will provide extensive areas of suitable alternative recreational opportunities for any new residents on the doorstep of the development."* (Paragraph 5.2.12 of ecological assessment dated April 2012 by Ecology Solutions Ltd).
- 3.11. Thirdly and finally, the application site is located towards the edge of the settlement of Great Wakering, which possesses most types of open space at or above the standards set out in the Open Space Study. Much of the provision is centrally located at the Great

Wakering Recreation Ground, which is less than one kilometre from the application site and which is recognised as the main recreational facility for the village. Given the relatively limited size of the application site and the requirements for buffer zones around LEAPs and NEAPs, it is more logical to improve the existing children's play and youth facilities at the recreation ground than to seek to accommodate new such facilities within the proposed residential development.

- 3.12. The site layout drawings submitted with the current application shows the provision of three areas of amenity space within the development, two of which include Local Areas for Play within them. Such play areas are designed to serve the youngest children and they should therefore be located within a short distance of all dwellings on the site, as is shown on the layout drawing. Provision for older children and youths can be located further away from home and therefore it makes more sense for LEAPs and NEAPs to be located in an area which already accommodates a level of recreational and play activity, such as the recreation ground.
- 3.13. Consequently, the applicants are willing to accept, in principle, that an appropriate financial contribution should be made to upgrade and improve the children's play and youth facilities at the recreation ground, subject to detailed discussions with the local planning authority regarding the identified needs of the local community.
- 3.14. In terms of access to other amenity open space in the village, the application site is within the pedestrian catchment area of the Little Wakering amenity space to the north, as shown in Map 3.3 of the OSS. It is also within the recommended walking distance (1200m) of the Great Wakering Recreation Ground, which is marked out for sports use, but which will also inevitably be used for casual play when the pitches are not in active sporting use.
- 3.15. In summary, the proposed provision of amenity space and two LAPs on site and a financial contribution towards the improvement of existing off-site children's and youth play facilities is considered to be an entirely appropriate and proportionate level of provision for the development. The creation and provision of natural and semi-natural greenspace on site is not considered to be appropriate and it is suggested that the local



**STATEMENT ON OPEN SPACE  
PROVISION FOR PROPOSED DEVELOPMENT ON BEHALF OF THE APPLICANTS**

Site at Former Star Lane Brickworks, Star Lane, Great Wakering, Essex

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May 2013

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authority's efforts would better be directed towards seeking the enhancement of public access to the adjacent Local Wildlife Site.