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Ms Lissa Higby – Programme Officer
Rochford District Council
Council Offices
South Street
Rochford
Essex SS4 1BW

19th April 2011
By email

Dear Ms Higby

**Rochford LDF Core Strategy Examination - Budget 2011 - Planning for Growth
Comments on Behalf of Mr & Mrs Poole – Lime House Industrial Park, Rayleigh**

We refer to the Council's letter dated 6th April 2011, seeking views from parties involved in the Rochford LDF process and relating to planning policy changes that were recently announced in the 2011 Budget, and how these may affect our case and the 'soundness' of the Core Strategy.

We have assessed the application of these policies to the Rochford Core Strategy Submission Version (including Proposed Changes) and on behalf of our clients, Mr & Mrs Poole – and we would make the following response, which we would kindly ask the Inspector to consider.

- i. **Sustainable Economic Growth and Jobs:** Whilst we do not intend to repeat the content of the Government's statement, we are concerned that the Council's proposed Spatial Vision, which underpins the Core Strategy, is not aligned with the reforms to the planning system, particularly the Government's "top priority" to "*promote sustainable economic growth and jobs*".

Our client has previously objected to the imbalance in the distribution of employment and housing growth across the District. This view has been supported by the Council's evidence base, in particular the de-allocation of well-established employment areas such as Rawreth Industrial Area and Hockley, and their proposed redevelopment for residential use. In our view, the Council's approach is flawed and illogical.

The Inspector will be aware that although the loss of employment land has been compensated by the identification of 18 ha of Future Employment Areas on land within the Green Belt, we do not consider that the rationale behind Policies ED3 and ED4 is aligned with Government's policy to promote sustainable economic growth and jobs. Whilst the proposal is likely to retain a number of the existing jobs, it will lead to the key sustainable development principles set out in national planning policy being compromised. Such an approach would require extensive site remediation to allow residential development, together with the further release of Green Belt land and the requirement for additional infrastructure to serve the new employment areas, which is a highly unsustainable strategy.



It will also undermine the delivery of the Government's clear expectation that the answer to development and growth, wherever possible, ought to be 'yes'. We therefore consider that the soundness of the Core Strategy is affected by this reform.

- ii. **New Presumption in Favour of Sustainable Development:** Our client has previously raised strong objections to the proposed distribution of new housing development across the District, and the choice of strategic housing locations that have been directed towards the least sustainable settlements. The commitment to introduce a strong presumption in favour of sustainable development in the forthcoming National Planning Policy Framework is a valid material consideration that affects the soundness of the Rochford Core Strategy.

We have maintained throughout the Core Strategy process that the distribution of development should be focussed within the higher tier settlements, primarily Rayleigh, and thereafter Rochford/Ashingdon and then Hockley/Hawkwell. Moreover, that there has been no proper consideration of the alternative sites, and that the Council's subsequent publication of their Audit Trail highlights the shortcomings in the decision-making process.

Whilst further guidance is anticipated on this policy reform, we understand that the Government's clear expectation is that the default answer to development and growth should be 'yes', except where this would compromise the key sustainable development principles set out in National planning policy. In this regard, we continue to maintain our objections that the choice of broad housing locations will not create or promote the most sustainable patterns of living across the District, nor bring forward a continuous supply of housing land.

There is an unjustified bias towards releasing Green Belt land in lower tier settlements in the District on high quality agricultural land that is liable to flooding, with poor access to public transport, community facilities and services. The choice of broad housing locations is set against the availability of alternative Green Belt sites in more sustainable higher tier settlements, such as Rayleigh. This includes Lime House Nursery Industrial Park and Garden Centre – an area of previously developed land in the Green Belt that adjoins the urban edge of Rayleigh, and which is highly accessible to the Town Centre, Southend Airport, and is fully capable of meeting sustainable development principles and being part of an integrated development.

The new presumption in favour of sustainable development also further undermines the Council's decision to continue to support the reallocation of Stambridge Mills from a saved employment site, to a new location for accommodating housing growth. Aside from the flood risk objections, the site's development for housing would represent a clear departure from the key sustainable development principles which are normally applied to the choice of housing sites in preparing LDF Core Strategies. There are no exceptional circumstances to justify this decision.

- iii. **Land Supply:** Another aim behind the introduction of the new presumption in favour of sustainable development is to take into account the need to maintain a flexible and responsive supply of land for key sectors, including housing. During the Core Strategy Examination, and subsequent consultation periods, we have expressed our concerns in relation to the delay in bringing forward the broad housing locations, and the time periods that have been assigned to this. The Core Strategy has made no contingencies, neither does it factor in any flexibility for development sites failing to come forward, and therefore fails to

take into account the latest advice to plan and maintain for a flexible and responsive land supply.

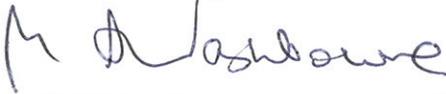
We have highlighted above where the application of the 'Planning for Growth Reforms' would in our opinion affect the 'soundness' of the Core Strategy.

Accordingly, we would respectfully ask the Inspector to take account of these issues, and our client's view, and we maintain that there is a strong case for finding the Core Strategy unsound.

Kindly keep us informed of progress – and if the Inspector has any queries, please contact me or Fiona Jury at our London office address, or at mike@wgdp.co.uk and fiona@wgdp.co.uk

Thank you for your assistance.

Yours sincerely,



M D Washbourne MRICS

Director

Cc. Mr & Mrs Poole