

Our Ref: JRF/SPP/10.1380

Your Ref: 16161 & 16163

18 April 2011

**Ms L Higby**  
Core Strategy Examination Programme Officer  
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**By post and email to [programme.officer@rochford.gov.uk](mailto:programme.officer@rochford.gov.uk)**

Dear Ms Higby

**Rochford Core Strategy Examination  
Response to Budget 2011 – Planning for Growth**

Smart Planning represent West Rochford Action Group (WRAG) and was present on Day 2 of the Examination, Wednesday 12 May 2010. We provided further representations by letter dated 28 June 2010 in response to the LPA's Audit Trail; and subsequently by letter dated 26 November 2010 in response to proposed changes to the Core Strategy Submission Document. We attended the reconvened Public Examination on 2 February which was formally concluded by the Inspector on that day.

We have been provided with a letter dated 6 April 2011 from Shaun Scrutton, Head of Planning and Transportation, Rochford District Council inviting a written response to the planning policy changes announced in the 2011 Budget. The letter was emailed to WRAG by Kay Tinson, Technical Assistant, Planning Policy, though not to Smart Planning. Our client was away and hence it was only brought to our attention after the weekend i.e. on Monday 11 April 2011 leaving only seven working days to respond.

We would therefore first comment on procedure. Firstly the Public Examination has been formally closed and it is highly unusual, if not procedurally incorrect to be inviting further comments on matters that have arisen after closure of the Public Examination. Secondly, if fresh consultation is to take place then the list of persons to be consulted should be comprehensive and the time period allowed for such processes should be reasonable.

If Smart Planning was not consulted, despite a public record of our involvement, then it is possible that other planning agents have been excluded from the consultation process. At best, others like us may have been given only short notice via their clients. There are only ten working days between 6 April and 20 April and this is during a period running up to four bank holiday days. One of the links is to a document numbering 131 pages. Any responses will inevitably be rushed which is not conducive to thoughtful, comprehensive planning strategy. We submit that this period falls considerably short of what should be considered a reasonable public consultation period. For these two reasons we submit that the public consultation process on this matter is flawed.

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Notwithstanding the above, the key matters relating to planning are contained on pages 43-48 of HM Treasury Publication: The Plan for Growth. There is a Summary of Planning Review Actions on page 49. Extracts from this document are contained in the Written Statement of The Minister of State for Decentralisation Mr Greg Clark which emphasises the prioritisation of growth and jobs in granting 'development consents' which we presume is akin to planning permission.

One key point of principle in Planning for Growth is that this should not be at the expense of the quality and character of the local environment. The Government proposes to introduce a 'powerful new presumption in favour of *sustainable development*...' (paras 2.11 & 2.12) This presupposes that the LPA understand the comparative characteristics of possible sites in the District. We have shown and indeed the LPA has failed to prove otherwise that they have not done the work necessary to compare the sustainability characteristics of competitor sites. Needless to say for example, if land west of Rochford is allocated for housing, the District's Best and Most Versatile land will be lost under concrete for ever. It is not sustainable to build on the most productive land that is capable of supporting the highest yielding and most diverse range of crops which is equally the best performing land in the face of inevitable climate change.

The Government's new initiative should not add momentum or stampede to allocate land before the proper baseline and comparative analysis has been undertaken. We would advise caution in any approach which appears to rush through the grant of planning permission without due consideration of all sustainability indicators.

The LPA appear to have adopted a high threshold in deciding which sites to look at concentrating for the most part on sites capable of providing 100+ units. This does not appear consistent with the thrust of the Localism Bill. There are many smaller apparently sustainable sites capable of contributing meaningfully to housing need, growth and jobs. This matter should be revisited through a more robust Core Strategy.

If the CSSD is formally adopted in its current unsuitable and underlying inadequate/poorly researched form then the new government proposals for involvement of neighbourhoods in shaping plans for the local area is simply too little too late. The local neighbourhood of west Rochford has been so disenfranchised in the current Core Strategy process that the 'shaping' of a neighbourhood plan under the proposed CSSD would be adding insult to injury.

WRAG has expended considerable time, resource and energy trying to engage the LPA and in many instances point out the absence of proper cogent analysis in assessing possible locations for development to no avail. The advent of neighbourhood planning under the coalition government will only make any sense if the CSSD is abandoned (because it is flawed and out of kilter) and a new Localism based Core Strategy which has the support of the neighbourhoods and properly researched, is formulated.

Notwithstanding the obvious flaws in the CSSD, the Localism Bill and the Planning for Growth agenda demonstrate that the direction of strategic planning has moved considerably away from the circumstances which first informed the CSSD. Trying to accommodate the full implications of this change of direction within a document that was already flawed is something which we say is highly inadvisable if not impossible. It will at best produce development that is less sustainable and in manner that is more harmful to the environment than it needs to be. It will divorce neighbourhoods from any belief in the planning system and will provide unjustified development gains to developer interests without proper justification.


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WRAG supports the proposed legislation to require cross-administrative boundary cooperation on planning issues. This is likely to have a significant impact on the possibilities for sustainable development and the locations that this could be provided. Historically there has been little cooperation over the boundary between the predominantly green belt area of Rochford District and the more urbanised Borough of Southend-on-Sea. Hence the new initiative backed by relevant legislation will enable more coherent and deliverable spatial planning in lieu of the proposed CSSD currently under consideration.

WRAG supports the government in its attempt to secure jobs and growth through the planning system. However, sustainability remains the key word which behoves decision makers to justify their spatial plans with cogent evidence to convince stakeholders that the best decisions have been made. The CSSD continues to fail in this respect and more so in the light of 'Planning for Growth'. This new government initiative will only be successful if the development options are comprehensively understood and assessed. The best and quickest delivery of development will not be achieved if the analysis has not been done.

This concludes our submissions on this matter, if there are any matters arising then we would be pleased to assist.

Yours sincerely



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**DIRECTOR**

c.c. Mrs A Henwood, Chairperson, WRAG