

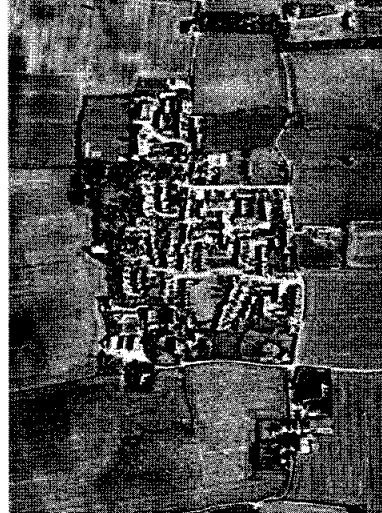
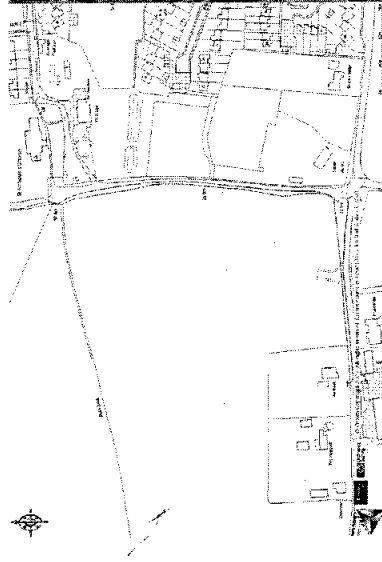
Rep- 26397, 26398, 26399, 26400, 26401, 26402 and 26403

**Rochford Local Development Framework
TOPIC PAPERS NOVEMBER 2010**

Proposed Amendments to the Core Strategy

**LAND TO THE WEST OF CANEWDON
ROCHFORD**

On behalf of [REDACTED]

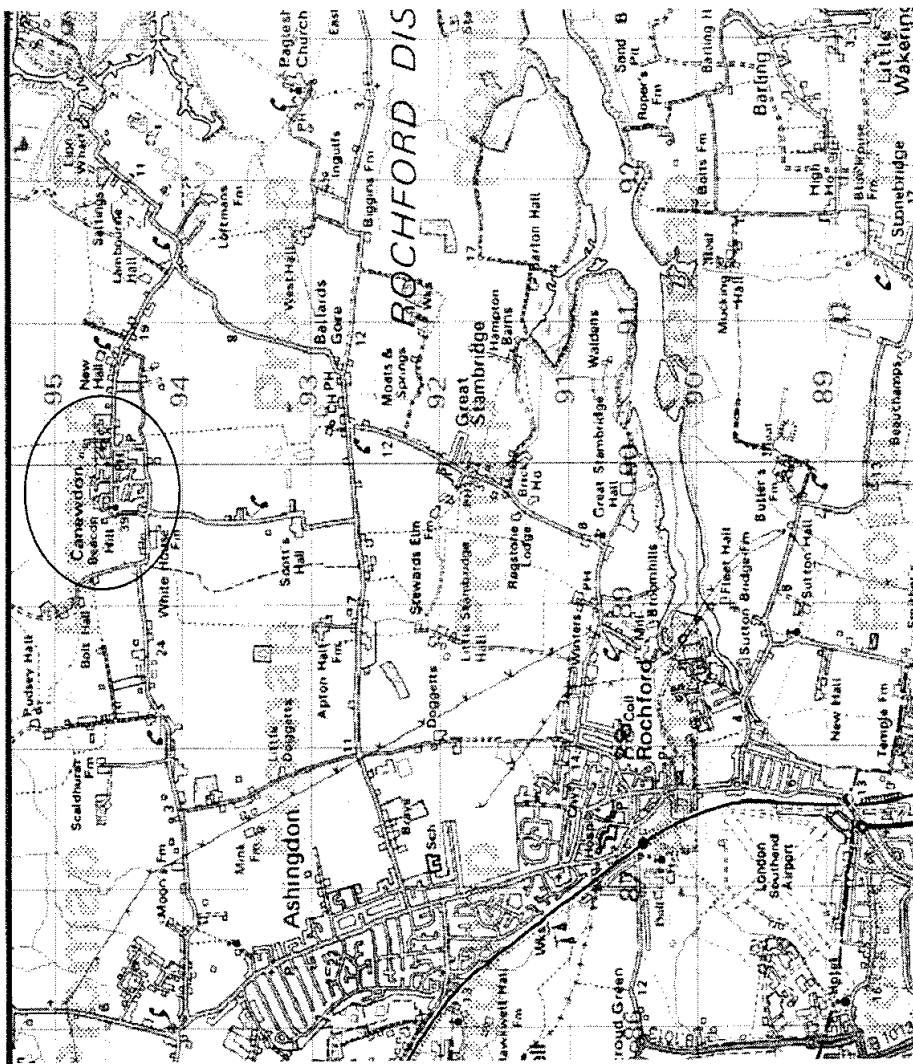


LAND TO THE WEST OF CANEWDON

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LAND TO THE WEST OF CANEWDON

1.0 Introduction

This representation is submitted on behalf of [redacted] proposed changes; whilst Section Six will summarise the report and offer a conclusion on the overall soundness of the proposed changes within the Topic Papers. Any references to specific sections or pages of the Core Strategy are based on the submission document.

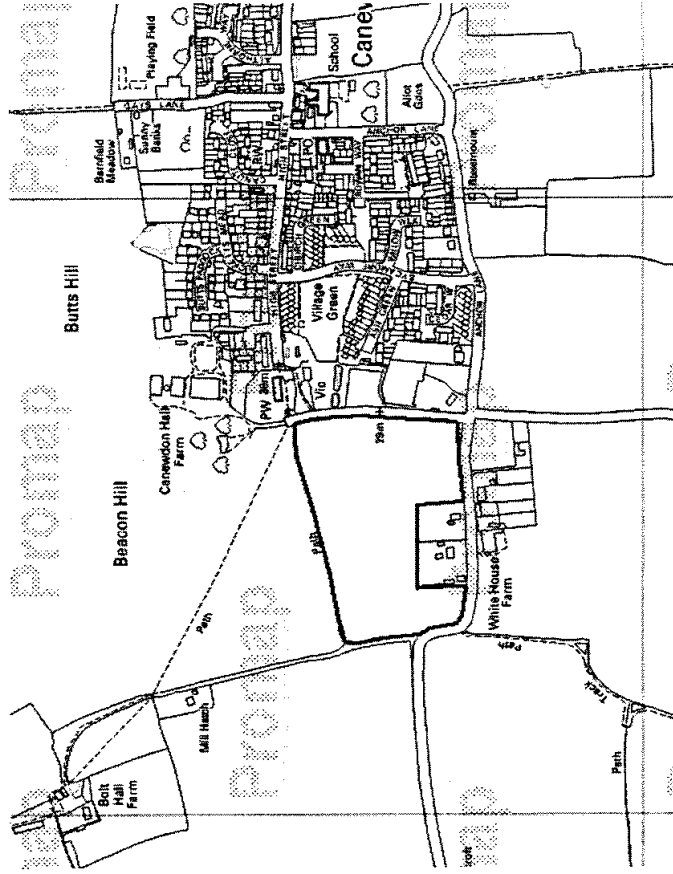
The site in question is outlined in red on the plan opposite, it is currently Greenfield land which is proposed for residential use. Part of the site falls within the proposed strategic location for housing as set out in the Core Strategy and its relevant amendments.

This information is submitted in response to Rochford District Council's three Topic Papers (October 2010) which detail the proposed changes to the Core Strategy.

This report will address all three of the Topic Paper subjects:

- Sustainable Housing Allocation for Rochford District
- Revision to the Green Belt boundary
- The Implications of Changes to PPS3

Following on from the Introduction, Section Two will describe the site and the policy context in which the site has evolved; Sections Three, Four and Five will evaluate in turn each of the Topic Papers and the relevant policies in the schedule of



LAND TO THE WEST OF CANEWDON

2.0 Site and Context

The site is located to the south west of Canewdon, at the north east corner of the Scotts Hall Lane and Lark Hill Road crossroads. As described previously it is currently Greenfield land which is proposed for residential use.

Totalling 6.5 hectares, topographically the land rises to the north where it is bounded by a public footpath running east to west. Canewdon is to the west of the site whilst to the south there are dwellings and landscaping features which would help to integrate the site whilst also softening views from this direction.

The site has been promoted throughout the Rochford LDF process including but not limited to the following consultations: the Core Strategy Submissions Regulation 27 Consultation (2009); the Allocations DPD Discussion and Consultation Document (2010); and Call for Sites (2010).

As set out in the Core Strategy and its relevant amendments, part of the site falls within the proposed strategic location for housing.



LAND TO THE WEST OF CANEWDON

Appendix CSSC2, p. 11

The schedule of changes includes Policy H2 which has been provided on the opposite page. This identifies South Canewdon as an area for envelope extension. It is recommended that the area of South Canewdon that is described should be identified spatially making it clearer to understand where the Council would like to see development in Canewdon. This is in line with p.43 Para 4.19 of the Core Strategy which states that "The Council will direct development to the most sustainable locations on the edge of settlements".

However, due to the small amount of development allocated in Canewdon, relying specifically on the South of the village limits development flexibility for the Council. Particularly if sites are not brought forward within this allocated timescale and when there are sites, such as this one to the south west of Canewdon which meets the Core Strategy criteria (p.43 Para 4.19) as demonstrated by Strutt and Parker's 2009 Core Strategy Regulation 27 Consultation.

Supporting Statements

Appendix CSSC2, p. 11

The table opposite, which indicates phasing, has been altered to bring forward development in Canewdon. This alteration for bringing forward phasing is supported, however as evidenced above it is recommended the table stipu-

Appendix CSSC2

Policy H2 – Extension to residential envelopes and phasing

The residential envelope of existing settlements will be extended in the areas set out below and indicated on the Key Diagram, to contribute to a fifteen-year supply of housing land from 2011 onwards as follows:

Area	Dwellings 2011-2021	Dwellings 2021-2026
North of London Road, Rayleigh	0	400
West Roehford	500	100
West Hockley	50	0
South Hawkwell	175	0
East Ashingdon	100	0
South East Ashingdon	0	450
South Canewdon	20	40
TOTAL	845	980

The above figures will be located as maxima over the fifteen-year period, in order to ensure that the amount of Green Belt land allocated for development is kept to the minimum required.

In order to ensure the appropriate phasing of development, and to avoid the premature release of Green Belt land, development specified for 2021-2026 will only be brought forward earlier if:

- a) It is required in order to deliver an adequate five-year supply of land, and,
- b) The net total of dwellings developed 2011-2026 within each of the general locations as set out in the above table is not exceeded.

The specific sites required in each location will be set out in the Allocations Development Plan Document

Development will be managed to ensure a housing delivery trajectory as set out in Appendix H2

Development within the above areas will be required to be comprehensively planned. A range of other uses and infrastructure (including on-site infrastructure), housing regard to the requirements of the Core Strategy, will be required to be developed and implemented in a timely manner alongside housing. Appendix H1 assumes the minimum number of dwellings required for each residential area, and should be read in conjunction with Policy CL11

The Council will maintain a flexible approach with regards to the timing of the release of land for residential development to ensure a constant five-year supply of land whilst balancing the need to maintain the Green Belt as far as practicable.

LAND TO THE WEST OF CANEWDON

3.0 Topic Paper 4

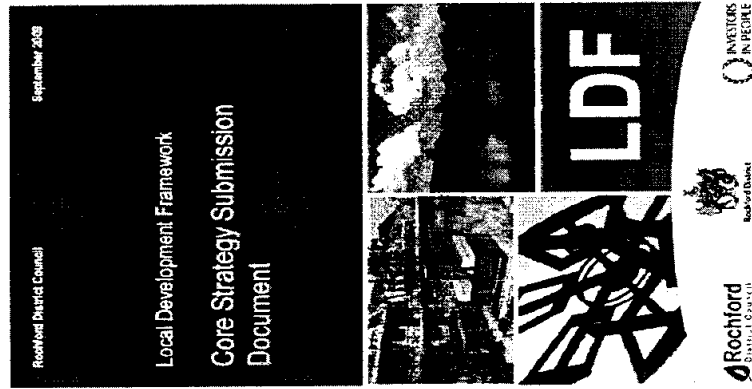
Revision to the Green Belt Boundary

Recommendations for change

p. 3 Para 3.1

The Topic Paper states that "this need cannot be accommodated without a small proportion of Green Belt land being allocated for development". With the proposed 20 year extension to the Plan period, it is important to consider the advice in Planning Policy Guidance 2 (Green Belts) "if boundaries are drawn excessively tightly around existing built-up areas it may not be possible to maintain the degree of permanence that Green Belts should have. This would devalue the concept of the Green Belt and reduce the value of local plans in making proper provision for necessary development in the future". As such allocating only a small proportion of green belt land may be detrimental to the overall value of the Core Strategy and devalue the concept of the Green Belt.

It is therefore recommended that the amount of Green Belt released is ensured to meet the relevant development needs for the Plan period, particularly taking into account land supply issues



Topic Paper 4 – Revision to the Green Belt Boundary

1. Introduction

11 Planning Policy Guidance 2 (PPG2) Green Belts, outline the need to protect Green Belt land, which has been shown to be protected and maintained, unless exceptional circumstances can be demonstrated as detailed within paragraphs 2.6 and 2.7

12 The Green Belt in Rochford District is recognised for its importance in meeting the District's needs for open space and the conservation of its natural heritage. This designation has assisted rural regeneration in the District by encouraging the recycling of derelict and other urban land, and the Council have been successful in maintaining a defensible Green Belt boundary.

13 However, the Core Strategy Submission Document proposes that a small proportion of the District's Green Belt be allocated for development. The Core Strategy Submission Document recognises that there is a need to reduce the existing Green Belt boundary, which results from a thorough examination of local housing needs and the future supply of habitable and deliverable land for development as set out in the Core Strategy Submission Document. The Core Strategy Submission Document provides the justification for the extension of development, which in turn necessitates the allocation of Green Belt land for development. However, subsequent to the submission of the Core Strategy for examination, the Secretary of State has revised Regional Strategies, including the East of England Plan. Consequently, the Secretary of State has advised that the allocation of Green Belt land that may be necessary to justify altering the Green Belt boundary and this paper addresses this issue.

2. Exceptional Circumstances

21 As noted above, PPG2 reserves that exceptional circumstances be demonstrated if the Green Belt boundary is to be altered. This section of the topic paper considers whether there are exceptional circumstances which warrant the allocation of land for residential uses and the allocation of land for employment uses.

The Allocation of Land for Residential Uses

22 In the case of Rochford District there is a recognised local housing need, a shortage of developable land to meet these housing needs

Topic Paper 4 - Revision to the Green Belt Boundary

LAND TO THE WEST OF CANEWDON

(Topic Paper 3, p. 19 Para 8.4) and local demand (Topic Paper 3,
p. 17 Para 8.1 and 8.5).

LAND TO THE WEST OF CANEWDON

Appendix C5SC3

The table opposite is taken from the schedule of changes and deals with extensions to residential envelopes post 2021. This states that the Council may bring development in these areas forward prior to 2026 if required to meet the five year land supply, but only if infrastructure to serve these developments is in place.

The allocations in the table are of a significant size, if this volume of development is not required and the provision of the required infrastructure becomes economically unviable, the 5 year land supply requirements may not be met. It is therefore recommended that not all of the 2026 extensions should rely on infrastructure to facilitate development.

Supporting Statements

p.2 Para 2.6

The premise to reallocate land from the Green Belt for residential development is supported. The site in Canewdon is suitable, available and achievable for development, particularly as it meets the Core Strategy criteria as described on the previous page of this report. As such the Green Belt boundary should be revised to include this site.

Appendix C5SC3

Policy H3 - Extension to residential envelopes post-2026

Post-2026, the residential envelope of existing settlements will be extended in the following areas (as indicated on the Key Diagram) to deliver the following approximate number of units post-2026.

Prior to this time, Green Belt land within such areas will be retained with the exception of release as per Policy H2, and land safeguarded to meet longer-term development needs.

Area	Dwellings post-2026
North of London Road, Rayleigh	150
South East Ashingdon	50
South West Hullbridge	500
West Great Wakering	250
Total	950

As part of a flexible plan, monitor and manage approach, and reflecting the figures as maxima, the Council will adjust the numbers on the table in response to changing housing supply requirements.

Development within the above areas will be required to be comprehensively planned. A range of other uses and infrastructure (including off-site infrastructure), having regard to the requirements of the Core Strategy, will be required to be developed and implemented in a timely manner alongside housing. Appendix H1 outlines the infrastructure that will be required for each residential area, and should be read in conjunction with Policy CLT1.

The Council will monitor the supply and development of housing in the District and may bring forward development in these locations prior to 2026 if required to meet five-year supply requirements, but only if infrastructure to serve such developments is also brought forward earlier.

LAND TO THE WEST OF CANEWDON

3.0 Topic Paper 5

The Implication of Changes to PPS3

Supporting Statements

p. 1 and 2, Para 1.7 and 1.9

We would support the Council's stance on town cramming and the continuation of limited infilling to contributed towards housing supply.



Topic Paper 5: The Implication of Changes to PPS3

- 1.1. The government has recently issued two key documents in PPS3:
 - The delivery of previously approved sites and in Areas B, this includes previous residential permissions, and
 - The current unallocated minimum density of 50 dwellings per hectare is covered from paragraph 4.
- 1.2. This paper seeks to identify whether the above two changes impact on the Rochford District Core Strategy.
- 1.3. Your report to council, through which it is being referred for inclusion in the Local Development Framework, should refer to PPS3, the implications for the site and the impact of the changes.
- 1.4. The Strategic Housing Land Availability Assessment (SHLAA) (2006) assumes a density based on the national guidelines of the site in question and a major residential area and density of the between 30 and 40 dwellings per hectare.
- 1.5. The Affordable Housing Unit by Assessment (AHUA) (2006) assesses a range of densities and housing mix in being 2006 housing density development. The AHUA is based on the national guidelines of the site in question and a major residential area and density of the between 30 and 40 dwellings per hectare. The AHUA is based on the national guidelines of the site in question and a major residential area and density of the between 30 and 40 dwellings per hectare.
- 1.6. The AHUA is based on the national guidelines of the site in question and a major residential area and density of the between 30 and 40 dwellings per hectare.
- 1.7. Changes to the definition of green areas within PPS3 do not make a material difference to the definition of green areas, but it does give the site a higher density than the site of the site in question.

LAND TO THE WEST OF CANEWDON

4.0 Summary

In summary, we support the Core Strategy Topic Paper alterations as described within this report and in particular welcome the alterations to phasing within Canewdon.

However by increasing the Plan period by 20 years it is important the land supply is available for the development period and the Council allow enough flexibility to address Rochford's housing needs without devaluing the Green Belt and inhibiting development through limiting areas where development can take place, and imposing economic constraints such as infrastructure and affordable housing requirements.

In conclusion, although we would support a number of the changes, having evaluated the soundness of the Topic Paper alterations by considering whether they are justified, effective and consistent with National Policy there are sections within the Topic Papers considered to be unsound.

Rep 26405 - 26408

Our Ref: JRF/10.1380

PI /LPA Ref: 16161 & 16163

26 November 2010

Mr S Hollingworth
Planning Policy Team Leader
Core Strategy Consultation
Rochford District Council
Council Offices
South Street
Rochford
Essex, SS4 1BW

Submitted online via <http://rochford.idi-consult.net/df/> and by POST

Dear Mr Hollingworth

Smart Planning represent [REDACTED]. Their original validly made objections were given the references 16161 & 6163. [REDACTED] were represented by Smart Planning on Day 2 of the Examination on May 12 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.

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

The first obvious observation is that the proposed changes were made before the successful challenge by CALA Homes (South) Ltd to the Secretary of State's abolition of Regional Spatial Strategy. This matter ought to be dealt with in accordance with the subsequent advice produced by the Planning Inspectorate for Inspectors. The evolution of this position is not however fundamental to [REDACTED] objections which deal with matters of principle rather than the precise quantum of development.

The proposed changes do not address [REDACTED] original objections in part or in full and indeed, the proposed changes replicate fundamental errors in the manner in which broad locations for housing have been identified, assessed and chosen.

There remains no cogent analysis of the loss of best and most versatile land. 'Competent advice' has still not been sought on this matter. There is still no cogent analysis of the importance and sensitivity of the cultural heritage, landscape and townscape of the west side of Rochford. There is still no sensitivity analysis in relation to the historic green belt boundary on the west side of Rochford and its analogy to a walled town.

....continued

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JRF/10.1380
Mr S Hollingworth

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On each of these three key points, the proposed changes still do not undertake any kind of sensitivity analysis or comparative exercise to determine preferred locations for development for example via scoring on a matrix of sustainability indicators. The LPA continue to fail to provide robust and credible evidence as to why west Rochford has been preferred over other locations when in fact it possesses such high environmental qualities that should presume against any such allocation. This remains a fundamental flaw in the Core Strategy Submission Document (CSSD) as proposed to be amended.

As before, [REDACTED] objects to the revised policy H2 – Extensions to residential envelopes and phasing were it indicates 500 houses to be provided in west Rochford (2011-2021) and a further 100 (2021-2026).

Topic Paper 3 - Housing

The LPA has reassessed Housing Need locally, the detail of which is presented in the proposed changes documentation. The new assessment of housing need (Section 3 of the Topic Paper) has failed to distinguish the local origins of that need (even though such data appears to exist). The absence of a distinction between the urban centres of Rayleigh and Rochford will lead to an unsatisfactory displacement of those in affordable housing need from Rayleigh to Rochford as previously set out in [REDACTED] written submission (Section 5.0) to the Core Strategy Examination. The proposed changes do not relate the origin of housing need to the ability of the subject town/village to accommodate that need in an environmentally sustainable manner.

Section 4 of the Topic Paper refers to 'Environmental and Physical Constraints within Rochford District'. Paragraph 4.4 states that '...the Sustainability Appraisal concludes that the policies proposed in the Core strategy represent the most sustainable approach to distributing the quantum of development...' WRAG has demonstrated, and it is a matter of fact, that the LPA has no basis for coming to this conclusion because they have not created a robust and credible evidence base and then undertaken a comparative exercise. [REDACTED] response to the LPA Audit Trail deals with the absence of cogent assessment in detail.

Topic Paper 4 – Revision to the Green Belt Boundary

This topic favour refers to only four purposes of including land within Green Belts, whereas there are five purposes. The purpose missed by the LPA is 'To preserve the setting and character of historic towns'. [REDACTED] has previously set out how the LPA has failed to properly assess the importance of the setting and character of Rochford and particularly on its west side. The omission in Topic Paper 4 of any reference to setting and character of historic towns is symptomatic of their consistent lack of attention to this important point. It demonstrates again, along with [REDACTED] earlier submissions that the LPA has not considered the setting and character of historic towns as part of a comparative assessment of possible locations for housing. The CSSD is unsound in this respect.

Sustainable (sic.) Appraisal of the Rochford Core Strategy Submission Document: Addendum

WRAG has already made objections to the Original Sustainability Appraisal. In the Addendum, under the heading 'Uncertainties' it states; '...Impacts on biodiversity and cultural heritage, for example will depend on more detailed information and studies at a site level...'. This is incontrovertible evidence that the LPA has not considered 'biodiversity and cultural heritage, for example...' as part of their sustainability appraisal of broad locations for housing development. Indeed [REDACTED] has shown that the LPA has not considered best and most versatile land, conservation and heritage, green belt boundary in relation to historic town character, demographics and to a lesser extent infrastructure.

... continued

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Mr S Hollingworth

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It is inimical to the proper consideration of the Core Strategy to relegate such considerations to a later stage. Once the broad locations have been decided then it will be too late. The choice of broad locations for development should be informed by the '...detailed information and studies at a site level...'. This is what [REDACTED] has been saying from the outset and forms a major part of their objection.

With regard to infrastructure [REDACTED] has previously criticised the generalised nature of the LPA's reliance on infrastructure improvement, and a failure to acknowledge the superior transport infrastructure that exists in Rayleigh. This situation has now worsened in that the LPA placed some reliance on the South Essex Rapid Transport (SERT) scheme to serve places like Rochford. That scheme has now been scrapped albeit very recently (press cutting 5 November 2010 enclosed). This further weakens the LPA's position in relation to necessary transport infrastructure and, in addition to all the other valid criticisms, places the LPA's CSSD in serious jeopardy. Although it was never undertaken in the first place, the scrapping of SERT should be factored into a Sustainability Appraisal of possible sites as part of the robust assessment of broad locations for development. It is obvious that the absence of SERT will add weight to the case for not indicating broad locations at Rochford, but favouring the better served settlement of Rayleigh.

[REDACTED] are confident that if the '...detailed information and studies at a site level...' are done now, as they should be, then it will be safely concluded that land west of Rochford is **not** sequentially preferable to other sites. Other sites will be shown to possess better environmental sustainability characteristics and which should therefore be identified within the Core Strategy in lieu of west Rochford.

The LPA say that '...these uncertainties have been acknowledged in the appraisal matrices where applicable...'. This does not abrogate the LPA from the responsibility of undertaking the necessary detailed studies **before** they make proposals for broad locations for housing development.

The LPA acknowledge that the proposed changes do not entail any change to the spatial aspects of policies H1, H2 and H3. [REDACTED] object to the absence of such change for reasons previously stated.

Assessment of Changes to Policies H1, H2, H3 and H7 – Assessment of Effects Table

Under SA Objective 9. 'Climate Change and Energy', the LPA make no reference to the effect climate change will have upon the ability of lower grade soils to produce diverse crops and of a sufficiently high yield. Had they done so, they are likely to have concluded that the Best and Most Versatile Land should not be developed before lower grade land. The highest grade land is the most productive and the most capable of continuing to produce diverse, high yielding crops under the environmental effects of climate change. Such land should therefore be protected from development to allow future generations the ability to feed themselves efficiently from locally derived produce and to minimise imports from remote locations including overseas.

Under SA Objective 11. 'Land and Soil' the LPA is factually incorrect to state that 'there are opportunities elsewhere ... to ensure that the best and most versatile agricultural land is protected particularly through the Allocations Development Plan Document.' With respect if the CSSD broad locations for development are adopted, then the ADPD can do very little to change that. The die will already have been cast. Robust and credible evidence should be gathered first, sustainability appraisals should be undertaken, and comparative assessment of possible sites completed. Only then can all stakeholders be reassured that the broad locations have been properly considered. Allocations through the ADPD can only follow on once the proper background work has been completed. The ADPD cannot change the broad locations after the event. That is a ludicrous suggestion.

...continued

JRF/10.1380
Mr S Hollingworth

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The LPA has already published a draft ADPD for public consultation. The draft ADPD was produced without "...detailed information and studies at a site level...". This is testimony to the fact that the LPA intend pressing ahead with the allocations without performing any of the detailed studies that [REDACTED] has pointed out are missing and which the LPA themselves are now suggesting are necessary. This process has attained a momentum that it does not deserve. It is incumbent upon all decision makers to take a rational view of proceedings to date, to conclude that the CSSD is not based on a robust and credible evidence base, to stop work on the ADPD, to undertake the detailed studies now, and to not adopt the Core Strategy until such time as it has been proven to be sound.

Yours sincerely

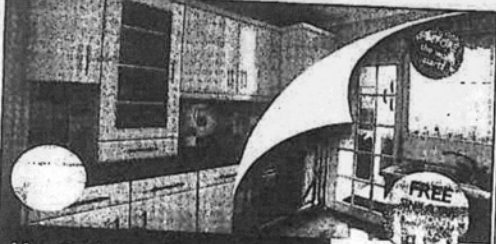
[REDACTED]

PP

[REDACTED]

Enc. Press Cutting: Cuts put an end to Superbus Scheme, Southend Standard, 5/11/10

[REDACTED]



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Cuts put an end to superbuses dream

SUPERBUSES which would have provided rapid public transport across south Essex have been shelved.

The £53million Government-funded South Essex Rapid Transit scheme was supposed to have been up and running by 2012.

However, the Department for Transport confirmed yesterday it had been put on a list of 34 major transport schemes across the country which will be reviewed following the reduced funding now available following Chancellor George Osborne's spending cuts.

Paul Malley, spokesman for the Department for Transport, said: "We are undertaking a further evaluation of the scheme. There should be a further announcement on what will be happening with it in January next year."

The South Essex Rapid Transit network would have run on its own dedicated lanes between towns.

State-of-the-art superbuses would also have been given priority at some traffic lights on existing roads.

A public consultation on the scheme was carried out across



No longer a Sert - Southend cabinet member Anna Walte with the proposed south Essex's rapid transport system

the region earlier this year.

Champions of the proposed network said it would have combined the reliability of a tram system with the responsiveness of buses.

Similar schemes are already up and running in York and Kent.

Malcolm Buckley, Basildon Council's cabinet member for the environment, was pleased

the scheme had been shelved.

He said: "We feel the system wasn't designed to support Basildon and I'm glad it is being sent back to the drawing board."

"It would have channelled transport towards Lakeside and away from Basildon, which would have been bad for our business community and shopping centre."

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Rep No 26410 - 26413

Rep: 26410 - 26413



29th November 2010

Planning Policy
Rochford District Council
Council Offices
South Street
Rochford
Essex
SS4 1BW

By Email (planning.policy@rochford.gov.uk)

Dear Sir,

ROCHFORD CORE STRATEGY SUBMISSION: SCHEDULE OF CHANGES

We act on behalf of [redacted] and [redacted] who own land [redacted]
[redacted], and [redacted] and [redacted] who own land [redacted] of [redacted]
[redacted]. Both sites are identified on the enclosed site plan.

My clients consider that the following amendments are neither consistent with national policy, justified nor effective.

- Paragraph 2.29 (P39);
- Paragraph 2.31 (P39);
- Paragraph 4.4 (P39);
- Paragraph 4.6 (P39);
- Table (P30/40);
- Appendix CSSC1;
- Appendix CSSC2; and
- Appendix CSSC3.

(i) **Consistent with National Policy**

The 'Schedule of Changes' are not compliant with national planning policy and in particular fails to take account of the adopted East of England Plan and fails to take account of emerging planning policy set out in the Government White Paper titled 'Local Growth: Realising Every Place's Potential - Presented to Parliament by the Secretary of State for Business, Innovation & Skills by Command of Her Majesty (28 October 2010)'.

East of England Plan

The proposed amendments to the housing numbers and the phasing set out in the Schedule of Changes conflicts with the requirements of Policy H1 of East of England Plan. This policy sets the housing provision requirement of Rochford District at 4,600 dwellings to be built between 2001 and 2021. The proposed changes are therefore unsound.

Rep No 26410 - 26413

It is recognised that the Regional Spatial Strategy was revoked in June 2010, however the High Court ruled that the Communities Secretary Eric Pickles acted unlawfully by revoking the regional planning strategies. Therefore the East of England Plan stills forms part of the development plan and is still a material consideration in planning decisions. The Council was premature in making the amendments to the housing numbers prior to the High Court ruling.

The East of England Plan (regional spatial strategy) is part of the 'development plan' for Rochford by virtue of Section 38(3) of the Planning and Compulsory Purchase Act 2004. The importance of the East of England Plan is emphasised in regulation 29 of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008 states which that a local planning authority must make a request to assess the general conformity of the DPD with the regional spatial strategy.

Furthermore paragraph 1.6 of Planning Policy Statement 12 (PPS12) states that spatial planning objectives for local areas, as set out in the LDF, should be aligned not only with national and regional plans, but also with the shared local priorities set out in Sustainable Community Strategies. Paragraph 2.1 states that the spatial planning process of place shaping and delivery aims to produce a vision for the future of places that responds to the local challenges and opportunities, and is based on evidence, a sense of local distinctiveness and community derived objectives, within the overall framework of national policy and regional strategies. The text box in Section 3 states that regional spatial strategies provide the overall spatial vision for the entire region, identifying the broad locations for growth, together with the housing numbers to be provided for in LDDs. The East of England Plan is a product of effective engagement with the local authorities and therefore it provides the regional framework against which local participation in creating Sustainable Community Strategies and Core Strategies takes place.

Therefore the housing provision for Rochford District as set out in Policy H1 of the East of England Plan is still relevant.

Government White Paper titled 'Local Growth: Realising Every Place's Potential'

The Council has failed to take account of proposed reforms to the planning system set out in the Government White Paper titled 'Local Growth: Realising Every Place's Potential'. On 28th October 2010 the Government published the Local Growth White Paper, which sets out a new approach to sub-national growth, including more information about Local Enterprise Partnerships and the Regional Growth Fund. It focuses on three key themes:

- Shifting power to local communities and businesses.
- Increasing confidence to invest, that is to create the right conditions for growth through Government allowing market forces to determine where growth takes place and provide incentives which ensure that local communities benefit from development.
- Focused intervention by tackling barriers to growth that the market will not address itself, supporting investment that will have a long term impact on growth and supporting areas with long term growth challenges manage their transition to what is appropriate for the local area.

Rep No 26410 - 26413

Section 3 of the White Paper confirms that the Government is committed to reforming the planning system, so that it actively encourages growth. Reforms will ensure that people have greater ownership of the planning system. Actions proposed include:

- Introducing a national presumption in favour of sustainable development, which will apply to decisions on all planning applications;
- Giving local communities new Right-to-Build powers;
- fundamentally reforming and streamlining national planning policy and guidance, presenting to Parliament a simple national planning framework; and
- Placing a new statutory duty to cooperate with local authorities, public bodies and private bodies that are critical to plan-making, such as infrastructure providers.

Paragraph 3.7 states a key part of planning reforms will therefore be to introduce a national presumption in favour of sustainable development, which will apply to decisions on all planning applications and will support the strategic provision of new homes, offices, schools and other developments that help drive the growth of the economy.

Paragraph 3.1 of the White Paper states that the main function of the planning system is to give people the opportunity to shape the look and feel of their communities, including to protect and promote important environmental and social interests and to provide sufficient housing to meet demand.

In respect to development plan, Paragraph 3.8 states that communities will be centre-stage in the reformed planning system whilst paragraph 3.9 states every neighbourhood will be given the chance to shape its own development through the creation of neighbourhood plans, which will give local communities greater flexibility and the freedom to bring forward more development than set out in the local authority plan. Neighbourhood plans will need to respect the overall national presumption in favour of sustainable development, as well as other local strategic priorities such as the positioning of transport links and meeting housing need.

The text box in Section 3 of the White Paper explains that the Government will create a framework of incentives for local authorities to deliver sustainable economic development, including the New Homes Bonus scheme, starting in 2011-12, which will support new housing development. Paragraph 3.29 provides further details of the New Homes Bonus. The scheme will ensure that communities and local authority decision-makers enjoy the benefits of growth and not just the costs. Starting in 2011-12 the scheme will match fund the additional council tax for each new home and property brought back into use, for each of the six years after that home is built. Central government will help establish the scheme with support of £196 million in the first year and £250 million for each of the following three years.

The promotion of localism and the changes to the planning system being brought into place by the Government provide an opportunity for the Council to enhance the quality of life of its residents, enhance the individuality and character of Rochford. The Core Strategy should therefore be a product of genuine community involvement that provides local people the opportunity to shape their communities.

It is clear from the scale of representations and comments received during the production of the Core Strategy that the local residents are strongly opposed to the spatial distribution of housing proposed across the district. In the interests of promoting localism and embracing

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the emerging planning policy, the Council should amend its spatial strategy to build in mechanism to introduce 'Neighbourhood Plans' that will set the quantum and location of housing and economic development for each neighbourhood. The Core Strategy should therefore set the district-wide housing requirements but not the broad locations.

Summary

The 'Schedule of Changes' are not compliant with existing national and regional planning policy and they do not take account of emerging planning policy reforms. There is no policy basis in which to make the changes and they are therefore unsound.

(ii) Justified

The changes made as noted above are unsound on the basis that they are not justified.

PPS12 states that to be 'justified' a DPD needs to be founded on a robust and credible evidence base involving evidence of participation of the local community and others having a stake in the area, and robust research. It is further stated that the most appropriate strategy when considered against reasonable alternatives.

The significant reduction of the housing numbers does not reflect the East of England Plan or the evidence base that informed this document.

General Approach

The East of England Plan requires a minimum of 4,600 dwellings to be provided in the District between 2001 and 2021. In addition, the Local Planning Authority is required to plan for delivery of housing for at least 15 years from the date of adoption of the Core Strategy. Therefore housing needs to be identified for the period to 2024.

The 2009 Strategic Housing Land Availability Assessment (SHLAA) examined the supply of housing land and, although identified some capacity from extant permissions and other appropriate sites, also ascertained that Green Belt would have to be reallocated in order to meet the requirements of the East of England Plan. It is stated that 2,745 dwellings are required on Green Belt land between 2006 and 2024. This is in addition to the 2,005 dwellings to be delivered on previously developed land.

The Core Strategy sets out the general locations for housing development. The Council state that the primary factors in determining the location of future housing include current infrastructure; access to services; facilities; housing demand/need; deliverability; public transport/possibility of reducing car dependency; opportunities to utilise brownfield land; community needs and physical constraints; need to protect areas of landscape value, ecological importance and high quality agricultural land. The Council states that it seeks to balance the distribution of housing by focusing growth upon the higher tier settlements.

The population of Rochford District is unevenly distributed with the largest settlement being Rayleigh which, in 2001, was home to 30,196 people, 38% of the District's residents. As such the Council identified Rayleigh as a primary tier settlement as it contains a range of services and facilities including good public transport accessibility. The Core Strategy however notes that their housing needs evidence indicates that 44% of the housing need in the borough

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originates from Rayleigh. This provides a strong basis in which to focus housing development upon Rayleigh.

Despite what is said in the Core Strategy, it is clear that Council has failed to consider a more balanced approach to housing delivery. The unbalanced approach is set out in the Schedule of Changes. However the Council's proposed housing locations do not reflect this statement as the scattered approach around the district will deliver housing away from public transport and key services and will lead to unsustainable patterns of growth. The Council's own evidence states that 44% of the need for housing is focused on Rayleigh, yet Rayleigh will only deliver 19% of housing on Green Belt sites. This will result in increased car movements between the settlements and will have an unsustainable impact upon the existing infrastructure.

The Schedule of Changes has failed to take account of the housing need for Rayleigh. There is a need for the Council to identify and significant increase in the housing provision for Rayleigh to meet the socio-economic objectives set out in the Rochford Core Strategy Submission draft.

(iii) Effective

The schedule of changes are unsound on the basis that they are not effective. The reduction of housing will have housing deliverability implications that will render these changes unsound. There is no demonstration of sound infrastructure planning. The Council should therefore consider smaller and easily developable sites that are well connected to the primary tier and most sustainable settlement of Rayleigh.

The housing reduction target is a material change that needs to careful consideration. If the Council is minded to pursue the housing reduction, then they will need to reassess the spatial strategy to take account of existing infrastructure; access to services; facilities; housing demand/need; deliverability; public transport/possibility of reducing car dependency. The housing reduction would provide the opportunity for the Council to reassess its approach and consider a more appropriate spatial strategy that meets the housing needs of Rayleigh.

On this basis, my clients consider that land south of Rayleigh would provide a more suitable and sustainable broad housing location. The sites that make up land south of Rayleigh are included on the enclosed site plan. Land south of Rayleigh is located to the south of the urban area of Rayleigh and has the potential to deliver up to approximately 290 market and affordable dwellings.

This broad location is just 1 mile from Rayleigh town centre and 1.4 miles from Rayleigh Train Station which provides convenient public transport connections to Southend-on-Sea, Stratford and London Liverpool Street. A number of bus routes operate along Eastwood Road, with a bus stop adjacent to the proposed access. This provides good and convenient public transport accessibility to Rayleigh Town Centre and Rayleigh Train Station and access to existing services.

This broad location is well located to the main centres of employment in Rayleigh being located in close proximity to the town centre but is also just 800 metres by foot from Brook Street Industrial Estate or approximately 1.5 miles by bike or car.

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The site adjoins the urban edge of Rayleigh to the south. The broad location abuts the rear boundary line of the dwellings located along South View Road and Eastwood Road and land to the south of Wyburns Primary School.

The broad location is visually contained by a mature wooded area that would also create a natural and defensible boundary for a future development.

This broad location has no existing function other than being used for extended residential garden use. The broad location has no beneficial agricultural function, no viable equestrian function and no commercial function. This land represents under-used land that in its current state detracts from the character and function of the area.

Land south of Rayleigh also has the following benefits:

- There are no public footpaths or rights of way that cross this site and the site has no recreational value.
- The proposed site is connected to existing utilities infrastructure.
- The proposed site could be accessed from Eastwood Road and Daws Heath Road.
- There are no contamination issues at this location.

(iv) Legal Compliance

My clients consider that the Core Strategy is not legally compliant on the basis that my client's were not invited to make representations to the Core Strategy Submission Draft. The Council were therefore in breach of Regulation 25(3) and PPS12 paragraphs 4.24 to 4.29. My client's were therefore not given the opportunity to comment on the spatial strategy and attend the Examination in Public.

This issue was raised at the recent Site Allocations consultation. The Council subsequently forwarded the Core Strategy Proposed Submission letters that were addressed to my clients. Despite forwarding these letters, it does not prove that the Council sent the letters as neither of my client's who all reside at four separate addresses received the said letters which suggests that a process error occurred at the time the Council published its Proposed Submission Core Strategy.

(v) Conclusion

I trust that the comments, made on behalf of my clients will be considered. However should you require clarification on any matters raised above, please do not hesitate to contact me.

Yours faithfully,

[REDACTED]
[REDACTED]

To Planning Department, Rochford District Council, Freepost CL1858, South St, Rochford, SS4 1BW

Core Strategy Consultation Oct/Nov 2010

Rep No 26418

I/we wish to register the following objections regarding the above consultation:

1. The Core Strategy is unsound because proposals to build on the Green Belt have not been properly evaluated; are contrary to government policy and alternatives not evaluated. There is no justification for this variance from government policy.
 - There is no evidence that the Council has undertaken a comprehensive and detailed (in planning terms) comparative assessment of the impact of the CS Locations. Were the alternatives put forward under the "Call for Sites" properly evaluated and evidenced?
 - Para 4.23 of the published Core Strategy states that the Council will prioritise the redevelopment of brownfield sites but the amended proposals still result in 67% of new dwellings being on greenbelt land (and any windfall sites will be too late to save green belt that has already been built on).
 - The two proposed new industrial sites will also be on Green Belt land.
 - The older component of our population is said by the Council to be a block on the release of "previously owned homes" but there are no proposals to release the blockage by requiring the provision of smaller homes in developments like Coachman's Court (Rochford, Sheltered/Wardened Flats for over 55's).
2. No justification or consultation regarding how the proposed total of 3,800 new homes has been calculated. The council turned down a motion from two members in this regard. This lack of consultation and inconsistency means the proposals are unsound.
 - There is now no proposed development proposed for Rayleigh over the first 15 years yet, according to the published Core Strategy (para 2.38 page 30), the greatest demand for housing is in Rayleigh at 44.4% of the District's total. There is something wrong here.
 - Have the alternatives been properly evaluated and evidenced?
3. Lack of appropriate infrastructure and the distributed approach negates economies of scale. Existing 'back of a fag packet' [RDC/ECC quote] estimates of £50-75M are unsubstantiated (and could increase) but still equate to £14/21K standard charges per dwelling. Is this viable, particularly for "Affordable Housing" and sustainable?
4. Development proposals for the first phase are concentrated in the centre of the district where the infrastructure, based on historical country lanes, cannot cope with existing traffic – there are a number of bottlenecks across this part of the District and being systemic in nature will not be improved by the relatively small improvements provided by the developments proposed.
 - There is no evidence that the consolidated impact of all the various developments on highways has been assessed and no consideration appears to have been given to mapping highways improvements to the housing phasing. Access road improvements in the West have been delayed until end of programme, resulting in road chaos for years.
 - As with other environmental issues, the capacity of the highways network should be assessed formally with consideration of the cumulative effects of other developments.The highways plan is unsound and not sustainable.
5. The Core Strategy only takes into account Flood risk identified by the Environmental Agency which is fluvial based (tidal) and does not take into account Surface Water flooding risk. This is despite the fact that majority of flooding in the area has been caused by the latter or a combination of both. It is wrong for the Core Strategy to only consider Fluvial flood risk. The Core Strategy is therefore unsound.

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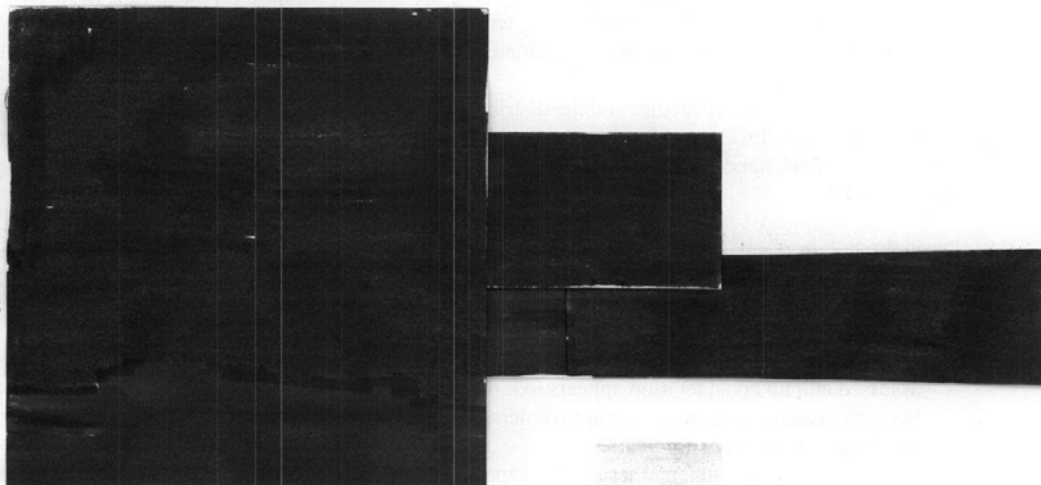
6. Gypsy sites - the proposals provide for 14 pitches by 2014 but no indication is given of where these should be sited. This issue has caused a lot of concern to many residents who favour a single, manageable site in a location with good road access and all appropriate services and the proposals are unsound and, probably, unsustainable.
- Gypsy/Traveller sites must be positioned in locations that have the best access to transport links and services. It is essential that any gypsy/traveller site developments are matched by appropriate infrastructure such as established road networks, water / gas / electric supply, mains sewerage, access for refuse / recycling collection, and access to healthcare and schools.
 - The choice of a suitable site(s) must ensure that such communities can be appropriately integrated, and promote the right level of community cohesion for these people. Inappropriate location of Gypsies and Travellers would not bring about desired cohesion, and if a poor choice is made by the Council this could lead to exactly the opposite and disharmonious relationships between communities and the local community would transpire.
 - In the light of the above, and in line with previous recommendations, if it is decided that Gypsies and Travellers must be accommodated on 'official' sites, then such sites are best suited to the west of the district. Any loss of countryside, greenbelt and open spaces in and around Hockley is considered unacceptable when there are known alternative locations that would be better suit mutual Council and Traveller needs.
7. The last consultation on the DPD Allocations was in April and is believed to have 'attracted' a record level of responses but has not even been considered by the council 6 months later. Revised proposals have now been made on aspects covered by the DPD. Similarly, proposals for Hockley Village Centre have been repeatedly rejected but are still included. This reflects the generally inadequate consultation during the entire process and means the Core Strategy is undemocratic and consequently the proposals are unsound.

Signed

Name

Address

Date



To Planning Department, Rochford District Council, Freepost CL1858, South St, Rochford, SS4 1BW

Core Strategy Consultation Oct/Nov 2010

REP No 26419

I/we wish to register the following objections regarding the above consultation:

1. The Core Strategy is unsound because proposals to build on the Green Belt have not been properly evaluated; are contrary to government policy and alternatives not evaluated. There is no justification for this variance from government policy.
 - There is no evidence that the Council has undertaken a comprehensive and detailed (in planning terms) comparative assessment of the impact of the CS Locations. Were the alternatives put forward under the "Call for Sites" properly evaluated and evidenced?
 - Para 4.23 of the published Core Strategy states that the Council will prioritise the redevelopment of brownfield sites but the amended proposals still result in 67% of new dwellings being on greenbelt land (and any windfall sites will be too late to save green belt that has already been built on).
 - The two proposed new industrial sites will also be on Green Belt land.
 - The older component of our population is said by the Council to be a block on the release of "previously owned homes" but there are no proposals to release the blockage by requiring the provision of smaller homes in developments like Coachman's Court (Rochford, Sheltered/Wardened Flats for over 55's).
2. No justification or consultation regarding how the proposed total of 3,800 new homes has been calculated. The council turned down a motion from two members in this regard. This lack of consultation and inconsistency means the proposals are unsound.
 - There is now no proposed development proposed for Rayleigh over the first 15 years yet, according to the published Core Strategy (para 2.38 page 30), the greatest demand for housing is in Rayleigh at 44.4% of the District's total. There is something wrong here.
 - Have the alternatives been properly evaluated and evidenced?
3. Lack of appropriate infrastructure and the distributed approach negates economies of scale. Existing 'back of a fag packet' [RDC/ECC quote] estimates of £50-75M are unsubstantiated (and could increase) but still equate to £14/21K standard charges per dwelling. Is this viable, particularly for "Affordable Housing" and sustainable?
4. Development proposals for the first phase are concentrated in the centre of the district where the infrastructure, based on historical country lanes, cannot cope with existing traffic – there are a number of bottlenecks across this part of the District and being systemic in nature will not be improved by the relatively small improvements provided by the developments proposed.
 - There is no evidence that the consolidated impact of all the various developments on highways has been assessed and no consideration appears to have been given to mapping highways improvements to the housing phasing. Access road improvements in the West have been delayed until end of programme, resulting in road chaos for years.
 - As with other environmental issues, the capacity of the highways network should be assessed formally with consideration of the cumulative effects of other developments.The highways plan is unsound and not sustainable.
5. The Core Strategy only takes into account Flood risk identified by the Environmental Agency which is fluvial based (tidal) and does not take into account Surface Water flooding risk. This is despite the fact that majority of flooding in the area has been caused by the latter or a combination of both. It is wrong for the Core Strategy to only consider Fluvial flood risk. The Core Strategy is therefore unsound.

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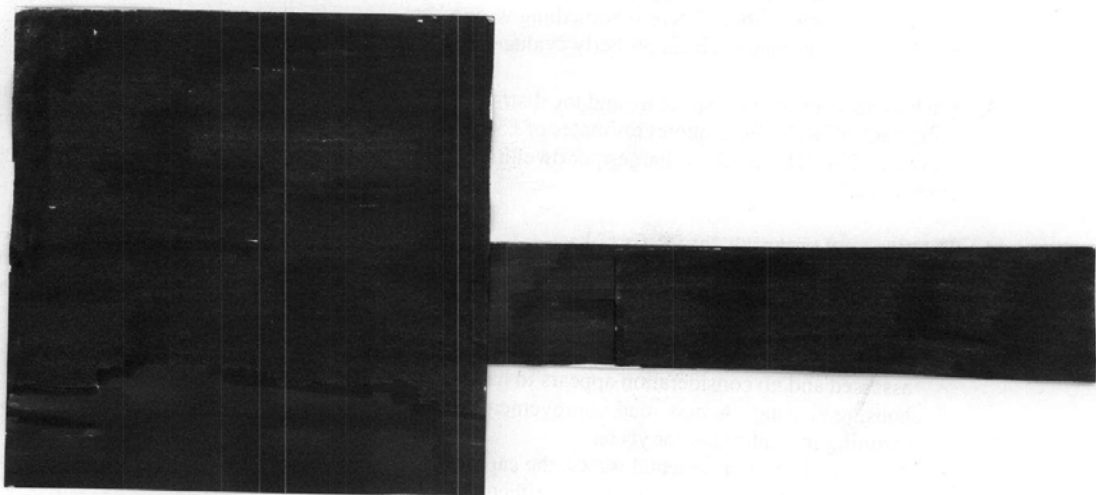
6. Gypsy sites - the proposals provide for 14 pitches by 2014 but no indication is given of where these should be sited. This issue has caused a lot of concern to many residents who favour a single, manageable site in a location with good road access and all appropriate services and the proposals are unsound and, probably, unsustainable.
- Gypsy/Traveller sites must be positioned in locations that have the best access to transport links and services. It is essential that any gypsy/traveller site developments are matched by appropriate infrastructure such as established road networks, water / gas / electric supply, mains sewerage, access for refuse / recycling collection, and access to healthcare and schools.
 - The choice of a suitable site(s) must ensure that such communities can be appropriately integrated, and promote the right level of community cohesion for these people. Inappropriate location of Gypsies and Travellers would not bring about desired cohesion, and if a poor choice is made by the Council this could lead to exactly the opposite and disharmonious relationships between communities and the local community would transpire.
 - In the light of the above, and in line with previous recommendations, if it is decided that Gypsies and Travellers must be accommodated on 'official' sites, then such sites are best suited to the west of the district. Any loss of countryside, greenbelt and open spaces in and around Hockley is considered unacceptable when there are known alternative locations that would be better suit mutual Council and Traveller needs.
7. The last consultation on the DPD Allocations was in April and is believed to have 'attracted' a record level of responses but has not even been considered by the council 6 months later. Revised proposals have now been made on aspects covered by the DPD. Similarly, proposals for Hockley Village Centre have been repeatedly rejected but are still included. This reflects the generally inadequate consultation during the entire process and means the Core Strategy is undemocratic and consequently the proposals are unsound.

Signed

Name

Address

Date



To Planning Department, Rochford District Council, Freeport CL1858, South Street, Rochford SS4 1BW

REP No 26420

Core Strategy Consultation October/November 2010

I/We wish to register the following objections regarding the above consultation: The Core Strategy is unsound for the following reasons.

1.No justification or consultation regarding how the proposed total of 3800 new homes has been calculated. Some councils have abandoned extensive redevelopment plans. The Council turned down some Members' proposal to review housing needs over time, instead of fixing these to 2030. Lack of consultation and inconsistency means Council's proposed housing numbers are unsound.

- There is now no proposed development for Rayleigh over the first 15 years yet, according to the published Core Strategy (para.2.38,p.30) Rayleigh has the greatest demand for housing at 44.4% of District total. There is something wrong here.

2.Development proposals for the first phase are concentrated in the centre of the district where infrastructure, based on historical country lanes, cannot cope with existing traffic: there are a number of bottlenecks across this part of the District and, being systemic in nature, will not be improved by relatively small improvements provided by proposed developments.

- There is no evidence that the consolidated impact of all the various developments on highways has been assessed and no consideration appears to have been given to mapping highways improvements to the housing phasing. Access road improvements in the west have been delayed until end of programme, resulting in road chaos for years.
- As with other environmental issues, the capacity of the highways network should be assessed formally with consideration of the cumulative effects of other developments.

The highways plan is unsound and unsustainable.

3.Proposals to build on Greenbelt have not been properly evaluated: there is no evidence that the Council has undertaken a comprehensive assessment of the impact of Core Strategy locations. Amended proposals still result in 67% of new build being on Greenbelt.

- At 4.9, Tier Settlements, Hockley/Hawkwell and Rochford/Ashingdon are joined at Tier 1 with Rayleigh, always an urban settlement, with Rochford second. But Hockley, Hawkwell and Ashingdon are separated by Greenbelt. Numbers in H2 suggest a proportion of this will be eradicated and above 3 village settlements become a conurbation. There is no justification for this variance from government Greenbelt policy.
- The 2 proposed new industrial sites will also be on Greenbelt.

4.Lack of appropriate infrastructure and distributed approach negates economies of scale. Existing estimates of £50-75 million are not substantiated and might even increase, but anyway equate to £14/21 thousand standard charges per dwelling. Is this viable, particularly for 'affordable' housing and sustainable?

5.The Core Strategy takes into account Environmental Agency estimate of Tidal flood risk, ignoring Surface Water flood risk. The majority of flooding in the area is caused by the latter, or combination of both. So Core Strategy is unsound.

6.Gypsy, Traveller sites: Core Strategy proposes 14 pitches by 2014, but no defined sites. Residents prefer:

- one site with good infrastructure: road, water, gas, electricity, sewerage, refuse/recycling collection, access to healthcare and schools.
- A suitable site must promote community cohesion for these people, or there will be inharmonious relations between them and the local community.
- If 'official' sites are proposed, following earlier recommendations, sites should be to west of the district. Loss of countryside, greenbelt, open spaces in/around Hockley is rejected, when known locations to suit both Council and Traveller needs are available.

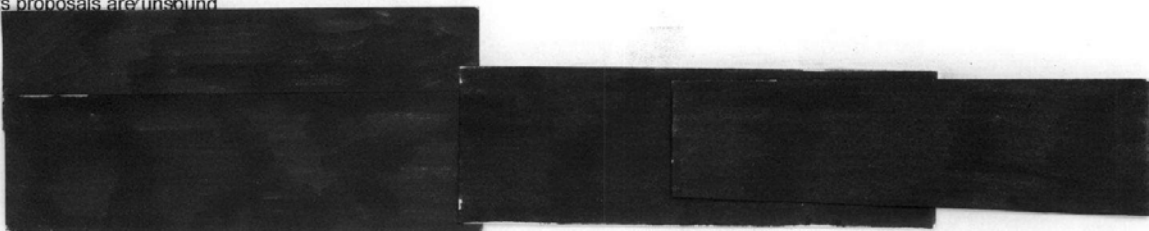
7.The April 2010 DPD Allocations consultation is believed to have 'attracted' record responses, but has been ignored by the Council 6 months later. Revised proposals on the DPD are now made, but repeatedly rejected plans for Hockley Village Centre are still included. This shows the inadequate consultation during the entire process and means the Core Strategy is undemocratic and consequently its proposals are unsound.

Signed

Name

Address

Date



Rep No 26428 - 26432

Rep 26428, 26429, 26430, 26431 & 26432



ROCHFORD DISTRICT COUNCIL LDF

NOVEMBER 2010

PROPOSED AMENDMENTS TO THE CORE STRATEGY

ON BEHALF OF [REDACTED]

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