

INTRODUCTION

1.0 INTRODUCTION

This representation is submitted on behalf of [REDACTED]. The site is allocated within the metropolitan green belt within the Rochford District Replacement Local Plan 2006, adjacent to existing residential development. The land forming the basis of this representation is identified on the adjacent plan and comprises an area of approximately 11 hectares located generally on the south western edge of Rayleigh. The town of Rayleigh is located approximately 18km south of Chelmsford and 9km north west of Southend-on-sea.

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

This report will address all three of the Topic Papers subjects, namely:

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

Following on from the introduction, the sections will evaluate in turn each Topic Paper and the relevant policies in the schedule of proposed changes, whilst Section Six will conclude the report and offer a conclusion on the overall soundness of the proposed changes within the Topic Paper. Any references to specific sections or pages of the Core Strategy are based on the submission document.



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SITE AND CONTEXT

2.0 SITE AND CONTEXT

The Great Wheatley Road connects with the High Street (A129) to the east 300m from the site. The A129 runs north to south providing connection to the town centre in the north and the A127 interchange to the south approximately 400m from the Great Wheatley Road junction.

Poyntens to the north of the site connects to the existing adopted local highway network. From Poyntens, connectivity to the town centre is achieved through Spring Gardens and Love Lane via the High Street. The site is within walking distance of the town centre, which is less than 0.5 miles away.

There are various leisure facilities that are within easy reach from Rayleigh including Belfairs swimming centre, and a library on the High Street.

The site is well related to the public transport network and is accessible by a variety of modes including bus and cycling.

Rayleigh town centre has a high proportion of comparison shopping units with a number of national multiple retailers. Convenience shopping, retail service sector, financial and business uses are also well represented. Rayleigh has an excellent level of services, and there are a variety of stores in the town centre and restaurants along Eastwood Road. There is a retail park at Rayleigh Weir.

There is a good choice of health care provision with 3 dispensing chemists in the High Street and Eastwood Road. There are doctors surgeries in the High Street, along Hockley Road and London Road. Dentists and opticians are located in the High Street and Eastwood Road.

Rayleigh benefits from a number of infant, junior and sixth form schools. The site is centrally positioned for access to schools, with Rayleigh Primary being the closest which caters for 3-11 year olds. The closest secondary school is FitzWimarc School in Hockley Road.



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THE TOPIC PAPERS

3.0 TOPIC PAPER 3

The title of Topic Paper 3 is Sustainable Housing Allocation for Rochford District.

Following the revocation of Regional Spatial Strategies, the District Council is proposing to make changes to the Submission Draft Core Strategy. The plan period has been extended by 5 years to make the timescale a 20 year period from 2011 to 2031. This means that the quantum of housing would be delivered over a longer period of time, and the quantum of housing would be a maximum figure. In basic terms, the overall effect would be reduce the annual delivery rate to 190 dwellings per annum (from 250 dwellings), and the five year supply of housing would be reduced to 950 dwellings (from 1250).

The amendments set out in Appendix CSSC2 propose amendments to Policy H2 as set out in the table opposite. In addition to the reduced housing delivery in the strategic locations identified, the policy sets out that these figures will be treated as a maximum.

Examination of the SHLAA demonstrates that the majority of the sites that were thought to be coming forward in 2011/2012 have been delayed. For many of them a planning application has not even been submitted let alone determined, and delivery will be over a much longer period of time than envisaged.

Taking into account this fact, along with the reduced annual delivery rate it is submitted that there is going to be a shortfall in housing and the District is not going to be able to meet its housing needs. As set out in our previous representations to the Core Strategy, it is submitted that an important settlement such as Rayleigh, should have more than one site identified. There is historically high demand for housing in Rayleigh, and it is submitted that this should not be concentrated on one site alone.

Area	Dwellings 2011-2021	Dwellings 2021-2028
North of London Road, Rayleigh	0	400
West Rochford	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	990

The site the subject of these representations could make an important contribution to the delivery of housing in the south west of Rayleigh over the necessary period. As previously identified in submission to the District Council the site is deliverable. It is submitted that the large requirement for infrastructure required in connection with the development of the land North of London Road, could not be financially supported or viable with the reduced housing figures over a longer period of time.

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THE TOPIC PAPERS

Post-2026 policy H3 of the document is proposed to be amended in the form of Appendix CSSC3. Again, no housing is shown to be delivered for South West Rayleigh, with the whole of the housing provision concentrated on the site to the North of London Road.

It is set out in Topic Paper 3 that the housing allocation for the District is based on a number of issues including housing need, environmental capacity, physical constraints, infrastructure and areas of economic development.

The Topic Paper acknowledges in Appendix 2 of the report to Council that in the Strategic Housing Market Assessment published in 2008, the figures for forecast and household growth demonstrate a much higher demand than the figures contained in the RSS. The figures for the Rochford District were showing (2001-2021) a RSS requirement of 4600 dwellings. The GVA forecasts a need for 6000 dwellings and the CLG need, based on projected household growth for 5300 additional dwellings.

The District Council simply dismisses these figures as being an overestimate of the requirement without any further justification.

It is acknowledged in paragraph 7.11 of the report to Council that the amended Core Strategy will deliver fewer dwellings in total and over a longer period of time. On this basis it is considered that the submission document fails the test of soundness for policy H2 in terms of not being justified. The reduction in the housing numbers and the focus on one site in Rayleigh is not founded on a robust and credible evidence base and it is not the most appropriate strategy.

The reduced housing figures also have an impact on the delivery of affordable housing. There are currently (September 2010) 920 people on the waiting list. There are a large number of newly formed households in the District and a large number of households that are unable to buy or rent. The amendments acknowledge that the District is likely to be unable to meet all of its housing needs, however a reduction in the housing delivery rate only compounds the situation.

The reduced housing numbers will not meet the local housing need. There is no evidence to suggest that there will be a reduction in the rate of new household formation, and the District Council has paid no regard to the results of research it commissioned itself.

The annual delivery rate of 190 dwellings per annum between 2011 and 2031 is not considered an appropriate delivery rate. In this respect the amendments are not sound. In addition to this, the reliance of a small number of sites means that the document is not sufficiently flexible enough to deal with changing circumstances.

THE TOPIC PAPERS

4.0 TOPIC PAPER 4

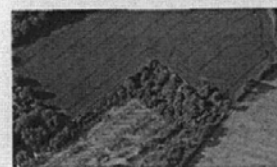
This paper relates to revisions to the Green belt boundary. The report acknowledges at paragraph 2.2 that there is a shortage of developable land within the District to meet housing need, and there is a need to allocated Green Belt land. This approach is welcomed however it is submitted that the revisions do not go far enough.

It is accepted that the release of Green Belt land is inextricably related to the delivery of housing numbers. It is submitted that the housing figures need to be increased to meet local housing needs, and this in turn supports the need for additional green belt land to be released.

The housing sites identified in the SHLAA are predominantly not coming forward at the rate anticipated. The capacity of the urban areas is limited and is unlikely to be able to accommodate the growth necessary. On this basis it is submitted that the review of the Green Belt boundaries needs to be wider reaching.

The site the subject of these representations, as shown in the photographs to the right, should be included within the Green Belt review.

The inadequate revision to the Green Belt boundaries is not based on a credible evidence base and therefore it is not sound or justified.



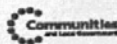
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THE TOPIC PAPERS

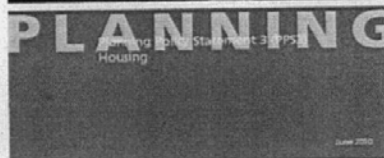
5.0 TOPIC PAPER 5

This Topic Paper examines whether to key amendments to Planning Policy Statement 3 (PPS3) impact on the Core Strategy. These key amendments are the exclusion of private gardens from the definition of previously developed land, and the deletion of a national indicative minimum density.

The amendment to the definition of previously developed land is likely to affect the supply of housing through the SHLAA. Some of the sites identified for development, where the application has yet to be submitted are likely to be within residential garden areas. In addition to this, the removal of the guidelines relating to densities, is likely to result in a reduction in the numbers being delivered on some sites.



Planning shapes the places where people live and work and the country we live in. It plays a key role in supporting the Government's wider social, environmental and economic objectives and for sustainable communities.



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SUMMARY

6.0 SUMMARY

Rayleigh is a principle town in the District with the highest population and the highest numbers on the housing waiting list. It is a key sustainable settlement in the District that can accommodate additional housing supply to meet the housing target. As outlined in this document, the land to the south west of Rayleigh should be included as a deliverable option to give the plan the necessary degree of flexibility in order to respond to changing circumstances. In summary:

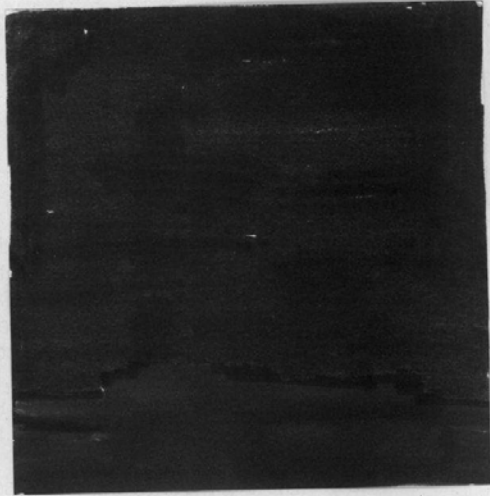
Policy H2 and H3— The proposed amendments fail the test of soundness for Policy H2 and H3 in terms of not being justified. The delivery of housing within Rayleigh is now heavily reliant on the houses proposed for allocation to the North of London Road. The continued reliance on this one site means that the document is not sufficiently flexible enough to respond to a variety of changes. The reduction in the annual completion rate and the overall delivery of houses is not based on a credible or robust evidence base, and is not the most appropriate strategy.

Paragraph 4.2—The reduction in the annual delivery rate to 190 dwellings is not sufficient to meet housing need. The document is unsound in this respect because the reduction is not based on a credible and robust evidence base.

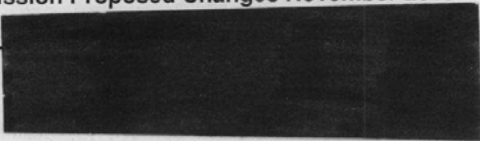
Paragraph 4.4—It is submitted that the Council does not sufficient evidence available in order to be able to accurately predict the housing requirement up to 2031.

Paragraph 6.3—The amendments do not go far enough in terms of the Green Belt boundaries. Additional land should be released to the south west of Rayleigh in order to ensure that local housing needs are met.

The change required to make the amendments to the Core Strategy sound is for the inclusion of the land to the south west of Rayleigh for the provision of at least 100 houses over the plan period. On behalf of [redacted] we welcome the opportunity to be involved at this stage of the production and look forward to contributing to the Examination in 2010.



**Rochford Local Development Framework
Core Strategy Submission Proposed Changes November 2010
Response on Behalf**



1.0 INTRODUCTION AND BACKGROUND



- 1.1 The following is prepared on behalf of [redacted] responds to the Proposed Changes to the Rochford Core Strategy Submission Draft. In our response to the Core Strategy Submission (CSS), we identified that the Core Strategy approach was sound, and particularly the land at south-west Hullbridge had no insuperable constraints to development and has the potential to contribute earlier than the trajectory set out within the CSS document.
- 1.2 As a consequence, we are concerned at the Proposed Changes in respect of the reduction in housing numbers, which we consider is based on political expediency. As a result of the CALA decision we also consider the Proposed Changes document to be premature, as it deletes all reference to the RSS. Given both the CALA decision, and at the time of writing, the block that has been placed by the Courts on the Government's subsequent statement, it is clear that the RSS is once again part of the Development Plan, and that as such, it is clear that decision makers should have full regard to Regional Strategies as part of the statutory development plan. The Proposed Changes do not have any regard to the RSS despite the fact that the East of England Plan remains as a document that at present the Core Strategy needs to accord with in line with PPS12. The Proposed Changes would therefore discord with the RSS and make the CSS unsound, justifying withdrawal of the Proposed Changes document.
- 1.3 In particular, we consider that the reduction in numbers is not based on real people with real justifiable needs, but on a rather crude and academic exercise which over-weighs



general environmental considerations against the need to meet such needs. Within this context, under provision is not a no-cost option as suggested by the Council.

- 1.4 As a consequence of this, the proposed re-scheduling of development from Hullbridge, a site that is one of the least constrained and most deliverable of all the sites identified to post-2026, represents poor planning, particularly as the Council's strategy concentrates all development away from the western part of the district for the first 10 years, meaning that little or no contribution to meeting needs in this area will be achieved.
- 1.5 The next section will summarise our response to the Proposed Changes within the context of the above, whilst section 3 will provide more detail on the land South West of Hullbridge, its opportunities and constraints, and why it can and should be brought forward within a very short timescale.

2.0 RESPONSE ON BEHALF OF

- 2.1 Given the above, we submitted to the CSS as a location for growth, the land at South-West Hullbridge will enable significant enhancement to facilities and services within Hullbridge, including anchoring existing services including local schools which have a surplus of places, provision of affordable housing and address deficiencies in open space provision. The site to the south-west of Hullbridge can be brought forward in an earlier time frame than is stated in the document as it has no known constraints for development. We submitted therefore that there should be a change to the timescale for the forward delivery of the proposed allocation in south-west Hullbridge.
- 2.2 We were therefore surprised at both the Council's perceived need to re-evaluate housing numbers in such a short space of time, and at the Council's decision to slip the land at South West Hullbridge to post-2026. Whilst the position with the East of England Plan has been in a state of flux since the change of Government, we consider that the Council's attempt to revisit the strategy of the CSS within a matter of weeks following 3 years of evolution is both opportunistic and politically expedient, and undermines the principles of proper planning. Other authorities are either continuing with their Core Strategies, or taking time to consider the implications of changes at the regional level of planning, undertaking a great deal of work in the process.
- 2.3 In the case of Rochford, the rush to change their CSS has become complicated by the reinstatement of the RSS following the CALA legal challenge, and the regional level of planning will therefore remain until at least November 2011 when it is currently proposed to be abolished in the Localism Act. Rochford are not in the middle of the CS Examination, and the recent changes to the status of the RSS means that if the Council want to progress in a meaningful and robust way, taking full account of all material planning considerations, then they should in order of preference:

- 1 go back to the submitted CS and let the Inspector consider the representations already made to that,
- 2 revert to using the proper Option 1 as further changes, or
- 3 go back and start again with a full and new analysis of all the data.

2.4 These options will be considered in more detail in the final section of our response.

2.5 Our reasons for this will also be set out below in our response to the CSS Proposed Changes. Our responses follow each proposed change under the page and paragraph number listed in the Consultation Document.

Page	Policy/ Paragraph	Suggested Change
7	1.2	<p>...will deliver the spatial aspects of the vision set out in the Sustainable Community Strategy and the Council's Corporate Plan, as well as how regional and national policies, including those contained within the East of England Plan, will be applied locally.</p> <p>Our Response:</p> <p>The plan needs to be re amended throughout to correct the status of RSS.</p>
21	1.25	Delete the paragraph.
22	1.27	The strategies at regional, sub-regional, county, district and sub-district levels include the following:
22	First text box on the page	Delete the text box.
29	2.29	<p>The East of England Plan has been revoked. The East of England Plan Review 2031, which was approved by the Regional Assembly, submitted to the Secretary of State, and represents the 'Option 1' numbers for Rochford District, set a housing requirement of 3,800 additional dwellings between 2011 and 2031. This equates to an average of 190 dwellings per annum in a sustainable manner. requires that a minimum of 4600 dwellings be built in Rochford District between 2001 and 2021. This figure is based on meeting the needs of the current and the future population of the District.</p> <p>Our Response:</p> <p>Following the CALA decision, the RSS has been reinstated, as has all other PPS advice making reference to RSSs. At the time of writing, a block has been placed on the Government's advice on the weight that can be given to</p>

		<p>the proposed abolition. PPS12 makes clear in paragraph 4.50 that under the Planning and Compulsory Purchase Act 2004 S 20(5)(a) an Inspector is charged with firstly checking that the plan has complied with legislation, which includes in particular checking that the plan conforms generally to the Regional Spatial Strategy. In addition to correcting the factual position relating to the RSS, the Council also needs to make clear to the Inspector how this part of extant national policy has been addressed, which is not apparent from the Proposed Changes.</p> <p>With regard to the option 1 figures, the letter from [REDACTED] of 6th July this year makes clear that "authorities may base revised housing targets on the level of provision submitted to the <u>original</u> Regional Spatial Strategy examination (Option 1 targets)" (my underlining). In the attached letter from [REDACTED] to Ipswich Borough Council of 9th August clarifying this matter, the response stating "you asked about what is meant by Option 1 numbers expressed in the 'original Regional Spatial Strategy (Option 1 targets)'. Option 1 numbers/figures in East of England RSS mean the housing numbers/figures Regional Assemblies set out in Draft RSS (Draft East of England RSS submitted to Secretary of State, 08/12/04); this is what is meant by the 'original' RSS."</p> <p>The 6th July letter does not appear to be listed as an Examination Core Document, and is therefore attached as appendix 1 with this response, together with the DCLG letter to Ipswich as appendix 2.</p> <p>It is understood that many other East of England authorities have received the same clear direction and advice. What seems clear is that at the same time as dropping the word 'original' from the Proposed Changes, Rochford DC have sought comfort from an obscure Hansard reference. No evidence has been provided within the Proposed Changes that the Council have sought to clear the matter with DCLG, and in the absence of such clarity, given the clear advice to the contrary supplied by DCLG, Rochford are deliberately underplanning future housing requirements, given their figure supplied to the original draft RSS of 230 dwellings per year.</p>
29	2.31	The <u>revoked</u> East of England Plan <u>acknowledged</u> that between 2001 and 2006 810 dwellings were completed in the District. Furthermore, between 2006 and 2008 an additional 618 dwellings were developed.
29	2.32	The Council are required to ensure there is an adequate supply of housing for <u>at least 15 years from the date of adoption</u> , and assuming adoption of the <u>RCS Rochford Core Strategy</u> in 2011 ¹⁰ , that would mean <u>continuous delivery of homes continuing the annual requirement beyond 2024 to at least 2026</u>
30	2.35	... It also calculates that there is a need for 131 net additional dwellings per annum to be developed in the District – this represented <u>52%</u> of the District's

		<p>annual housing completion requirement as set out in the East of England Plan (2008). The Thames Gateway South Essex Strategic Housing Market Assessment notes the need to ensure that the affordable housing requirements set by local authorities do not render the delivery of housing economically unviable and recommends local authorities across the housing market area set a requirement for 35% of new dwellings to be affordable.</p>
38	Objectives	<p>Ensure the delivery of an adequate supply of sustainable dwellings to cater for the District's growing demand, as per the requirements of the East of England Plan (2008) and a 15 year housing land supply.</p> <p><u>Ensure the delivery of homes to meet the needs of the District's population, balanced with sustainability considerations and, in particular, accounting for the environmental constraints in the District</u></p> <p><i>Our Response:</i></p> <p>The environmental constraints of the district are mentioned, but neither the Proposed Changes nor the Sustainability Appraisal Addendum mentions what these constraints are, or why they are unique to Rochford. What is clear is that Rochford is affected by the same or fewer constraints when compared to other Green Belt authorities, of which there are many. Adjacent Southend would appear to have much greater constraints to growth despite being a higher order service settlement, as it is more developed and has less space into which it can expand, given the close proximity of settlements.</p> <p>Whilst the SA addendum does highlight marginal benefits in delaying growth, this does not change its overall conclusion that the vision and objectives of the Preferred Options assessment (October 2008) were appraised by Enfusion and performed well against the majority of SA objectives, and that the reappraisal of the CSS resulted in findings being significantly unaffected (Enfusion 2009). Indeed, the addendum highlights that the impact on cultural heritage, landscape and townscape, and accessibility will be neutral. There will be a negative impact on the provision of affordable housing, as well as delaying provision to settlements such as Hullbridge, which the addendum acknowledges has educational capacity, and that increasing housing capacity has the advantage of utilising that capacity.</p> <p>Whilst we recognise the importance of balancing growth against environmental constraints, this exercise had been undertaken with the CSS with no significant environmental harm being caused. The Council are seeking to over-state this consideration in order to justify a political decision to avoid growth. Indeed, in attempting to claim that they are</p>

		<p>'balancing' growth and environmental considerations, means in effect a tacit admission that needs are not being fully met. The Council fail to deal with the harm caused by this failure, or identify how or where such needs will be met. As set out above, we firmly consider that the Council cannot be allowed to get away with the idea that under provision is a no cost option. The need is real people with real justifiable needs not just an academic numeric exercise.</p>
39	4.2	<p>The East of England Plan requires a minimum of 4600 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 (2010) and, in so doing, assume that the average annual requirement of 250 units will continue beyond 2021 to 2025. <u>The East of England Plan (2008) has now been revoked. It is therefore necessary to consider what level of housing provision is appropriate for Rochford District. Topic Paper 3 to the Core Strategy discussed this issue in detail. In summary, it concluded that the figures within the draft East of England Plan Review 2011-2031 ('Option 1' figures) are the most appropriate for Rochford District. This equates to 3,800 dwellings, or 190 dwellings per annum delivered between 2011 and 2031.</u></p> <p><i>Our Response:</i></p> <p>This issue has been addressed above, and again it is noted that Rochford DC have selectively quoted the clear advice on what constitutes the 'original' RSS.</p>
39	4.3	<p>Rochford's allocation is based on meeting current and future needs of the population <u>balanced with sustainability considerations</u>. Current need encompasses the number of people in the District who are living within a household wanting to move to their own accommodation and form a separate household but are unable to do so (e.g. adult children). Projected need is derived from the supposition that the population will increase from 81,300 in 2007 to 87,000 by 2021.</p>
39	4.4	<p>The East of England Plan notes the provision of housing within local authorities between 2001 and 2006, and specifies the remaining provision between 2006 and 2021. Rochford District is required to accommodate 3,790 dwellings between 2006 and 2021, at an approximate average of 250 dwellings per year. Post 2021, in accordance with PPS3, the District is required to continue the development rate of 250 dwellings per year. As such, the Core Strategy addresses the location of housing provision to 2025. <u>The Council will allocate land for a maximum of 2,850 dwellings to be delivered between 2011 and 2026, at an approximate average of 190 dwellings per year. To ensure development is sustainable in the long run, the Council will continue</u></p>

the annual-plan for housing provision after the 15 year plan period; this will ensure a greater level of certainty and permanence of the Green Belt. As such, the Core Strategy addresses the location of housing provision to 2031.

Our Response:

Both this paragraph and the table on pages 39 and 40 start at 2011 and plan on the basis of 190 dwellings to 2031. Again, this relies on the review of the RSS, which is not what is advised. Indeed, given its early stage and the fact that it is not being pursued, means that the weight that can be given to it is minimal. Extending the time frame to 2031 is supported, although objection raised to the fundamental basis of 190 dwellings per year as set out above. What the document does not do is look at the start of the RSS period, ie 2001, and assess performance against the original yearly requirement of 230 dwellings per year as set out in the 'original' option 1 RSS, and increased from 2007 to 250 dwellings per year in the adopted RSS to take account of poor performance in Rochford to 2006. These were obviously the right figures for the time and were accepted by Rochford as being so, particularly as the 230 per year projection was originally suggested by them and has not been challenged since.

The following table is derived from Rochford's own figures contained within Topic Paper 3 and the 2009 Annual Monitoring Report, and shows performance year by year since 2001, in addition to projecting forward Rochford's estimates from brownfield land and greenfield releases, assuming Rochford's figure of 190 dwellings per year from 2011:

	Actual Completions	Extant Permissions	Brownfield SHLAA	Extensions to residential envelopes	Council Total	RSS Annual Requirement	Annual Shortfall (Council Figures)	Cumulative Running Average (Council Figures)
2001-02	129				129	230	-101	-101
2002-03	165				165	230	-65	-166
2003-04	197				197	230	-33	-199
2004-05	58				58	230	-172	-371
2005-06	262				262	230	32	-339
2006-07	449				449	250	199	-140
2007-08	169				169	250	-81	-221
2008-09	102				102	250	-148	-369
2009-10	86				86	250	-164	-553
2010-11		57			57	250	-193	-726
2011-12		166	20		186	190	-4	-730
2012-13		100	157		257	190	67	-663
2013-14		56	50		106	190	-84	-747

2014-15	125	50	175	190	-15	-762	
2015-16	113	125	238	190	48	-714	
2016-17	50	200	250	190	60	-654	
2017-18	136	225	361	190	171	-483	
2018-19	80	75	155	190	-35	-518	
2019-20	115	75	190	190	0	-518	
2020-21	75	95	170	190	-20	-538	
2021-22		195	195	190	5	-533	
2022-23		270	270	190	80	-453	
2023-24		200	200	190	10	-443	
2024-25		175	175	190	-15	-458	
2025-26		150	150	190	-40	-498	
2026-27		250	250	190	60	-438	
2027-28		200	200	190	10	-428	
2028-29		225	225	190	35	-393	
2029-30		175	175	190	-15	-408	
2030-31			100	100	190	-90	-498
TOTAL	1617	379	921	2785	5702	6200	-498

sources: AMR 2009 and topic paper 3

This clearly shows that the Council have consistently underperformed against agreed RSS requirements, and are carrying a shortfall in the current year of over 700 dwellings based on their own figures. The strategy proposed by the Council will consistently carry forward this deficiency, which will remain at just below 500 dwellings having a dramatic negative impact on meeting both general housing needs, and particularly affordable housing. It should be noted that the Council's actual performance over the last 10 years equates to just under 161 dwellings per year, mostly during a time of economic buoyancy.

Whilst we of course do not accept the Council's suggested requirement going forward the shortfall from previous years means the requirement for the first few years needs to be increased by 700. Again, without prejudice to our principle argument that 190 dwelling per year is not justified, the current shortfall could be achieved by increasing the figure by 140 to 330 for the first 5 years. This would accord with the approach of the adopted RSS, who increased the option 1 figures to meet an identified shortfall at the time the RSS was adopted.

It would also urgently bring forward affordable housing provision. The Council have admitted at both the CSS Examination and at the recent Hawkwell and Coombes Farm appeal Inquiries that affordable housing provision in the District is "very poor" (Inspector Coombes Farm, para 104), and that there is "a substantial need" (Mr Hollingworth, quoted in Inspector's report, Hawkwell para 47). It was agreed in the Hawkwell Inquiry

that there is a net annual need in Rochford District of 131 dwellings per year. Between 2001 and 2008 only 155 units were produced. In 2008-9 there was a net loss of 1 unit, meaning a total provision of 154 units 2001-09, against a need of 1048, resulting in a shortfall/unmet need of 894 units, again a shortfall that the Council have tried to ignore and do not propose to make up in the early years of the CSS. More importantly, Topic Paper 3 para 3.16 identifies that the annual affordable housing need according to the SHMAA increases to 196 dwellings per year, only a third of which can realistically be met to 2031 (see our response to policy H1 below).

Indeed, the overall housing deficiency (including affordable housing) will rise to well over 700 dwellings between now and 2016 given the inevitable delays in bring forward greenfield site releases, justifying in our view a front-ended approach which does not leave sites that can be delivered quickly to the end of the CS period, but brings them forward to meet existing shortfalls and demonstrable needs.

In our view, however, the Council's expectations of delivery from extant permissions, brownfield land and indeed from greenfield releases are unrealistic, on the following basis:

- Sites with planning permission: it is unrealistic to expect all sites with planning permission to be developed, and the Inspector to the last Local Plan Review recommended that the Council apply a 10% flexibility figure to allow for some sites not coming forward. This figure should therefore be reduced by 10% on the same basis ie 38 dwellings;
- Brownfield sites: As with other objectors, we are particularly concerned with the inclusion of the Stambridge Mills site, given both its status as flood zone 3, together with the ongoing objection by the Environment Agency to the CSS. The Inspector into the Coombes Farm appeal also had concerns, noting that *"however, EA maintain their objection to allocation of the site within the CS for housing on the basis of flood risk and an exceptions test has not been passed as required by PPS25 for residential development. Whilst development on this site is possible, there are significant constraints and a reasonable prospect of housing being delivered within 5 years cannot be assured."* Despite this, the Council continue to rely on this site delivering between 2013 and 2015. The Inspector will note that the numbers have dropped from 250 to 163, which is the same number as proposed in an application submitted in August. Despite three months elapsing since then, the application remains invalid and unprocessed. The Council have produced a sequential test for the site. With regard to this we cannot see the logic of identifying a brownfield site in flood zone 3 over releasing Green Belt land, when the Council have got to release Green Belt land anyway, and

are going through a process of identifying such land. Para 14 and annex D of PPS25 simply use the definition of "reasonably available sites", without offering a judgement on whether GB sites under review for release fall into this category. Our view is that as PPS3 annex C states that SHLAAs and reasonably available sites can be greenfield, and the Council's SHLAA includes yet-to-allocated GB sites, then the Council have over-stated the GB constraint, as they could easily bring forward GB land available in zone 1 in sustainable locations that has already been identified for housing, for example in SW Hullbridge which the Council do accept is appropriate for development.

As a consequence, the Stambridge Mills site should not be included, and this would reduce the contribution from brownfield sites by 163 dwellings. In addition, the Council state in Topic Paper 5 para 1.5 that the Affordable Housing Viability Assessment (2010) tested a range of densities and found that in testing 20dph; lower density development will still provide positive residual values, although significantly below those at 30dph and that residual values are higher for development at 45 dph. As such, it concludes that the former minimum density of 30dph stipulated in PPS3 is therefore, in general, considered to be an appropriate minimum density to continue to apply to Rochford District, particularly in terms of estimating residential capacities of potential sites.

In response, this is an extraordinarily simplistic assessment based entirely on the affordable sector, and the withdrawal of the minimum density requirement will enable greater flexibility in planning properly new private and affordable housing developments, taking account of economics which apply on a site by site basis, and the surrounding context. Indeed, it contradicts para 1.7, which states that changes to the definition of garden areas within PPS3 do not impose a moratorium on the development of garden areas, but it does give further weight to the Council's concerns vis-à-vis 'town-cramming' and the need to protect the existing character of residential areas. This is further contradicted by para 1.9 which states that in any case, it is still appropriate to permit limited infilling within the existing residential envelope, as this will reduce the pressure on Green Belt sites for future development whilst ensuring the efficient and effective use of land within the urban area.

Retaining the 30dph minimum density is in our view a crude attempt to maximise dwelling numbers from brownfield land, and to minimise green belt release. This may be a reasonable broad objective but a sophisticated approach to planning and housing delivery is required and has been recognised by central government. This will include recognising the need for a greater proportion of family housing. As such

		<p>the minimum density should be deleted, and this will have an effect on brownfield land numbers, evidenced by the recent drop in numbers on the Stambridge site.</p> <ul style="list-style-type: none"> • <u>Greenfield sites</u>: the Council in Topic Paper 3 Identify that contributions from greenfield sites are not expected to deliver until 2014-15 at the earliest, and then only by 50 dwellings. We consider that this is justification for early release of greenfield sites. We consider that given the delays caused by the current new consultation, the likelihood of reopening the CSS Examination, and the changed position of the status of the RSS which the Council have not had regard to, it is likely that this delivery timescale will be increased, particularly given the need to secure outline permission and reserved matters, resolve conditions/Section 106 obligations, secure infrastructure, and deliver completed houses. We estimate based on our experience of bringing forward housing allocations that this process can take 3 to 4 years, and this will be longer if the Council decide to revisit their strategy as a consequence of the Inspector's report. This is particularly the case with sites that need to secure new infrastructure such as Hall Road Rochford, itself a site that we consider will be difficult to integrate with existing development and landscape as previously raised, and which the Inspector will be looking at closely given the substantial level of objection. • In addition, we have also raised concerns over the locations at Canewdon, given the lack of a service base in the village and very difficult topography, and the location at Hockley which appears to be based on the existing greenhouses, but which appears to have a very difficult access. <p>Even if the Inspector agrees with the greenfield sites, slipping the programme by a year would increase the deficiency in 2015 to over 800 dwellings, whilst the deletion of Stambridge Mills and a reduction of sites with planning permission by 10% would increase the shortfall to nearly 1000 dwellings, more if brownfield sites are assessed against a lower standard density.</p>
39	4.6	<p>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 <u>had</u> to be reallocated in order to meet the requirements of the <u>now revoked</u> East of England Plan. as outlined below. <u>Having regard to the housing supply requirements following the revocation of the East of England Plan, some Green Belt land will have to be reallocated in order to deliver 3,800 dwellings by 2031.</u></p>

		as detailed below																																									
39,40	Table	<p>Delete table and replace with:</p> <table border="1"> <thead> <tr> <th rowspan="2">Source</th> <th colspan="5">Dwellings</th> </tr> <tr> <th>2011-2016</th> <th>2016-2021</th> <th>2021-2026</th> <th>2026-2031</th> <th>Total 2011-2031</th> </tr> </thead> <tbody> <tr> <td>Housing target (190 dwellings per year)</td> <td>950</td> <td>950</td> <td>950</td> <td>950</td> <td>3800</td> </tr> <tr> <td>Extant planning permissions</td> <td>322</td> <td>0</td> <td>0</td> <td>0</td> <td>322</td> </tr> <tr> <td>Existing allocations/ other appropriate sites identified in Strategic Housing Land Availability Assessment</td> <td>465</td> <td>456</td> <td>0</td> <td>0</td> <td>921</td> </tr> <tr> <td>Total without Green Belt release</td> <td>787</td> <td>456</td> <td>0</td> <td>0</td> <td>1243</td> </tr> <tr> <td>Green Belt release required</td> <td>163</td> <td>494</td> <td>950</td> <td>950</td> <td>2557</td> </tr> </tbody> </table> <p>Our Response:</p> <p>Given our response to para 4.4 above, the table needs to identify existing deficiencies and to take account of our findings set out above.</p>	Source	Dwellings					2011-2016	2016-2021	2021-2026	2026-2031	Total 2011-2031	Housing target (190 dwellings per year)	950	950	950	950	3800	Extant planning permissions	322	0	0	0	322	Existing allocations/ other appropriate sites identified in Strategic Housing Land Availability Assessment	465	456	0	0	921	Total without Green Belt release	787	456	0	0	1243	Green Belt release required	163	494	950	950	2557
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42	Policy H1	<p>Replace with following:</p> <p>Policy H1 – The efficient use of land for housing</p> <p>The Council will enable the delivery of 3,800 dwellings between 2011 and 2031, maintaining a rolling five-year supply of 950 dwellings until at least 2026.</p> <p>The Council will prioritise the reuse of previously developed land and ensure the delivery of appropriate sites within existing settlements identified by the Strategic Housing Land Availability Assessment.</p> <p>The Council will seek the redevelopment of Rawreth Lane Industrial Estate, Stambridge Mills and Star Lane Industrial Estate for appropriate alternative uses, including residential development, with alternative employment land allocated in appropriate locations as identified in Policy ED4.</p> <p>Any scheme for the redevelopment of Stambridge Mills must include adequate flood mitigation measures to satisfy the PPS25 exceptions test.</p> <p>Appendix H1 outlines the infrastructure that will be required for the development of newly allocated housing sites.</p> <p>The remaining housing requirement that cannot be delivered through the</p>																																									

redevelopment of appropriate previously developed land will be met through extensions to the residential envelopes of existing settlements as outlined in Policies and H2 and H3.

Residential development must conform to all policies within the Core Strategy, particularly in relation to infrastructure, and larger sites will be required to be comprehensively planned.

In order to protect the character of existing settlements, the Council will resist the intensification of smaller sites within residential areas. Limited infilling will be considered acceptable, and will continue to contribute towards housing supply, provided it relates well to the existing street pattern, density and character of the locality.

The Council will encourage an appropriate level of residential intensification within town centre areas, where higher density schemes (75+ dwellings per hectare) may be appropriate.

Our Response:

For the above reasons, we object to the figure of 3800 dwellings 2011-31 as not being in accordance with the RSS or indeed the original option 1 figures. In addition, this level of provision falls short of projected dwelling need in the District, leading to further shortfalls in both market and affordable housing provision. Topic Paper 3 makes the following points:

- There has been a recent rise in those on the waiting list from 702 to 920 (para 3.2)
- Population growth is expected to continue in the district (para 3.11)
- The ageing population will restrict the availability of housing to new residents
- Both GVA Grimley and DCLG projections on housing growth demonstrate a much higher demand on existing dwellings than the RSS.
- The net annual housing need in Rochford has increased by some 65 dwellings per annum, this is mainly due to the increase in newly forming households and the increase proportion of households who are unable to buy or rent (para 3.27)
- Para 3.16 states that the SHMA identifies an annual affordable housing need of 196 dwellings per year.
- Para 3.28 states that the net annual demand for affordable housing in the District is calculated to be 196 dwellings per annum. If the total annual housing supply were to be 250 dwellings (as advocated by the SHMA), 78% of all new housing would have to be affordable in order to meet the total need.
- The revised housing total is projected to deliver only 57 to 67 per year, less than a third (para 7.12)

Despite this, the Council in the second part of the document seek to restrict numbers on environmental grounds, stating in para 4.4 that the Sustainability Appraisal concludes that the policies proposed in the Core Strategy represent the most sustainable approach to distributing the quantum of development allocated to the Council, "but raises concerns in respect of that actual quantum". In our view it does no such thing, merely highlighting that there is a balance to be struck. The Council overweigh the need to retain the Green Belt, and indeed in paragraphs 3.6 and 3.61, hint that housing projections do not take account of the "policy aims in local authorities" and "policy intervention" to redirect housing to "more sustainable locations within the housing market area". This is made explicit in para 5.4, which states that "there is a strong argument that any growth in the housing market over provision for the local needs of the area should be redirected through active intervention by policy makers to other locations within Thames Gateway South Essex."

Despite the clear needs identified in the document, the Council seek to reduce their housing requirement based on their claim that previous forecasts were made during economic buoyancy, thereby assuming that current economic conditions will prevail for the next 20 years (para 3.24), and that household formation in the 20-34 age group has declined, which is not surprising given that the Council have failed to deliver sufficient housing over the last 10 years to meet the needs of its growing population, leading to an ageing profile. Despite this, they seek to decant their self-generated housing needs to other districts, further failing to meet needs, admitted by the fact that less than a third of affordable housing needs will be met over the next 20 years. Given that minus 1 affordable dwelling was delivered last year, the Council are clearly failing to correlate and meet the real needs of real people living in the District, and this will worsen with the Council's revised strategy.

In addition, paragraph 7.1 of Topic Paper 3 suggests that the revocation of the East of England Plan provides a "*welcome opportunity*" to reconsider the total housing numbers to be accommodated within Rochford District, and that whilst the numbers identified in the East of England Plan for Rochford were informed by consideration of projected need and demand, though "*accepting that Rochford is not an appropriate location for housing growth, it is not clear that full account was taken of the relationship between Rochford District and surrounding areas (particularly within the same housing market area), concerns with regards to sustainability, and the array of environmental and physical constraints the District is subject to*". It states that this point is further emphasised in the findings and conclusions in draft RSS31, which proposed a reduced annual provision for Rochford.

		<p>In response, the figures put forward to the Review of the RSS were established by Rochford DC, and have not been tested in the same way as the original adopted RSS. They can be afforded less weight accordingly. The figures for the adopted RSS were subject to rigorous scrutiny by both the Council, Government, respondents, and by an independent Panel of Inspectors, who considered all factors including those mentioned in para 7.1. The figure of 230 dwellings per year as originally put to the Secretary of State as the option 1 figure was endorsed by the Panel, and was only increased to 250 dwellings per year in the final adopted version due to poor performance by Rochford in meeting the 230 dwelling figure, resulting in a shortfall.</p> <p>Again, the Council are ducking the need to meet the real needs of real people living in the district, and given previous shortfalls means the actual need is urgent now and should not be put off. Early release of a deliverable site such as SW Hullbridge is therefore essential.</p>												
42	4.16	In order to fulfil the requirements of the East of England Plan and to meet the housing needs of the District, the Council is required to allocate additional land for residential development, including land which is currently allocated as Green Belt, due to the limited supply of alternative land.												
42	4.17	Whilst the Council acknowledge that the housing requirement stipulated in the East of England Plan is a minimum, it must be also mindful of the need to maintain Green Belt as far as possible. The need to ensure provision of housing to meet local needs, it must also be mindful of the need to maintain the Green Belt as far as possible.												
44	Policy H2	<p><i>Replace with following:</i></p> <p>Policy H2 – Extensions 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:</p> <table border="1"> <thead> <tr> <th>Area</th> <th>Dwellings 2011-2021</th> <th>Dwellings 2021- 2026</th> </tr> </thead> <tbody> <tr> <td>North of London Road, Rayleigh</td> <td>0</td> <td>400</td> </tr> <tr> <td>West Rochford</td> <td>500</td> <td>100</td> </tr> <tr> <td>West Hockley</td> <td>50</td> <td>0</td> </tr> </tbody> </table>	Area	Dwellings 2011-2021	Dwellings 2021- 2026	North of London Road, Rayleigh	0	400	West Rochford	500	100	West Hockley	50	0
Area	Dwellings 2011-2021	Dwellings 2021- 2026												
North of London Road, Rayleigh	0	400												
West Rochford	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	990

The above figures will be treated 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. 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 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.

Our Response:

The Council do not propose a rationale for choosing the sites included within Policy H2, or how each site will meet specific local needs across the district in the timeframe identified. It is noted for instance that allocations in the first 10 years of the CSS are focused on eastern areas of the district, with no greenfield development at all in the west of the district. This would have an adverse effect on existing infrastructure, such as roads with Core Strategy Topic Paper 2 identifying that these sites appear to have issues with congestion on Ashingdon Road and on the B1013. Concentration in one part of the district ie one housing sub-market would also affect



		<p>delivery, with housebuilders competing in the same area and would also affect the spatial delivery of affordable housing would be detrimentally affected. In our view, there should a balanced approach, spreading growth across the district during all phases of the CS.</p> <p>In particular, it is noted from paragraph 4.24 (below) that sites included within policy H2 are those that by implication more deliverable and have less impact on infrastructure provision and existing communities. It is known that the Rayleigh West Water Treatment Works (where land SW Hullbridge will drain to) has spare capacity, whereas the Rayleigh East WTW (where the sites identified in the first 10 years will drain to) does not. Given the need for a new school and highway infrastructure at West Rochford, together with the need to redevelop employment sites at London Road Rayleigh, it is difficult to see how these statement can be substantiated, given the evidence that set out above that land at Hullbridge is by comparison unconstrained, with minimal new infrastructure required. Indeed, the Council have demonstrated there is evidence of convenience undertrading in Hullbridge, which suggests that one or more shops is under threat, particularly as the projections is for leakage to increase, according to studies undertaken on their behalf, and a delay in the delivery of new development could threaten the retention of existing retail services. In addition, according to Essex County projections, existing primary schools have substantial capacity, again which can only be remedied by an influx of pupils. A delay in development in Hullbridge will lead to further decline in pupil paces, and a threat to the schools themselves.</p> <p>Hullbridge positively needs growth to maintain facilities and services. Any reduction or loss of these would be a major adverse impact on the sustainability of the area and Plan.</p>
44	Heading	Extension to residential envelopes post-2021 <u>post-2026</u>
44	4.24	<p>In considering the general development locations for post-<u>2026</u> development, the same issues as for Policy H2 above have been considered, but areas identified for post-<u>2026</u> development may not be immediately deliverable, or the situation vis-à-vis infrastructure and the impact on existing communities is such that their delivery earlier would not be appropriate.</p> <p><i>Our Response:</i></p> <p><i>See response to policy H2.</i></p>
44	4.25	<p>The figures, with an annual average of <u>190 250</u>-units, meet the <u>annual housing target</u> East of England Plan's minimum in the period 2021-2025 and do not make allowance for any contribution through windfall. The figures are approximates at this stage. The exact figures will need to be determined through the Allocations Development Plan Document process or, where appropriate, Area Action Plans at</p>

		<p>a later date. <u>In determining such figures, the Council will take a plan, monitor, manage approach to the supply of housing land, assessing progress through the Annual Monitoring Report, in order to ensure that the extent of the Green Belt is retained as far as practicable.</u></p> <p>Our Response:</p> <p>Annual Monitoring Reports are not produced frequently enough to properly react to potential housing shortages and to bring forward sites in a timely manner. As set out above, it is also apparent that Rochford have not dealt with previous annual housing shortages, leading to the present position where existing needs and RSS requirements are not being met. In order to provide reasonable certainty, the Council must build flexibility into the CSS now and bring forward a deliverable site to meet current needs, in order to avoid endless reviews and uncertainty.</p>						
45	4.26	As with the <u>pre-2026</u> development areas, it is important to note that development coming forward within the areas outlined in Policy H3 will have to conform to the other policies within the Core Strategy.						
45	4.27	The Council will monitor the provision of housing and residential development may be allocated within the general locations <u>prior to 2026 in place of locations identified in Policy H2, if delivery of the latter is delayed to the extent that such action is necessary in order to maintain a five-year housing supply, additional housing land is required.</u>						
45	Policy H3	<p><i>Replace with following:</i></p> <p>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. 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.</p> <table border="1"> <thead> <tr> <th>Area</th> <th>Dwelling post-2026</th> </tr> </thead> <tbody> <tr> <td>North of London Road, Rayleigh</td> <td>150</td> </tr> <tr> <td>South East Ashingdon</td> <td>50</td> </tr> </tbody> </table>	Area	Dwelling post-2026	North of London Road, Rayleigh	150	South East Ashingdon	50
Area	Dwelling 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.

Our Response:

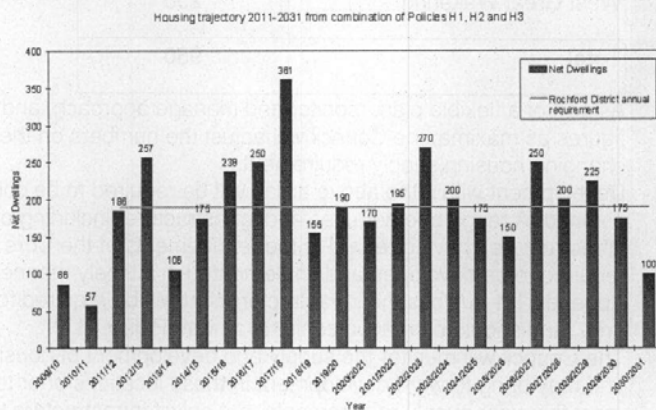
See response to policy H2. The policy mechanism for safeguarding land and bringing sites forward without recourse to development plan review needs to be set out. Keeping the sites within the Green Belt will require review, and will conflict with the longevity point in PPG2 that Green Belts should endure. In addition, keeping the land inside the residential envelope but also in the green belt will create confusion and uncertainty. The land must be excluded from the GB now, but can of course still be subject to constraint policies, as appropriate.

46	4.30	... As such, 35%, being the indicative aim for the region-District as a whole as set out in the East of England Plan <u>assessed in the Viability Study Report is not considered appropriate impractical</u> as a local requirement, <u>especially for development towards the west of the District and in a longer term on the whole.</u>
49	4.46	<u>The East of England Regional Assembly has prepared a single issue review on Gypsy and Travellers accommodation that has resulted in the allocation within the East of England Plan of 15 pitches to be provided in Rochford District by 2011. An assessment of Gypsy and Traveller accommodation needs was undertaken in 2009 (Essex Gypsy and Traveller Accommodation Assessment) and identified a need for 14 additional pitches in Rochford District by 2021.</u>
49	4.47	Given the historically low demand within the District, provision for any additional pitches post 2011 <u>2021</u> will be subject to further review of need.
50	Policy H7	The Council will allocate <u>145</u> pitches by <u>2021</u> 2011 , to meet local need as per the

(Para 1) findings of the Essex Gypsy and Traveller Accommodation Assessment (2009).

55-57 Appendix H2

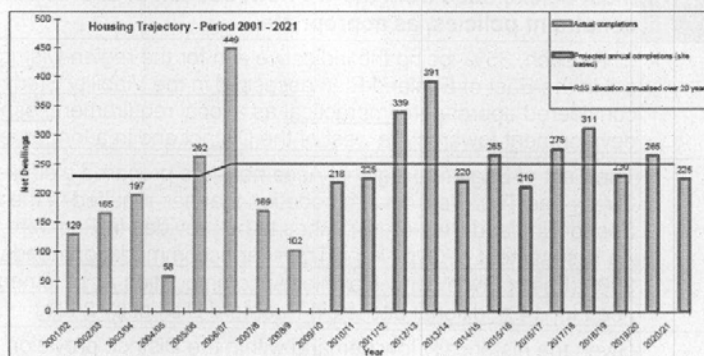
Replace with CSSC4



Our Response:

It is important to compare the revised trajectory as set out above, with the trajectory set out in the 2009 Annual Monitoring Report, as below, which shows a dramatically different profile. It should be noted that the Council fail to put an annual requirement on 2009 and 2010 (250 dwellings), which would show shortfalls in the crucial early years of the CSS, particularly up to 2015, notwithstanding the substantial shortfalls not shown on the trajectory pre-2009.

Figure 4.4 – Housing trajectory



Source: 2009 AMR

65	6.3	Policy SS7 of the East of England Plan states that the regional Green Belt boundary is appropriate and should be maintained. However, Rochford District is part of the Thames Gateway Sub-Region and the East of England Plan Rochford District Council recognises that local strategic revisions to the Green Belt boundary <u>are may be necessary to meet local development needs in sustainable locations , but that it is important to maintain the extent of the Green Belt as far as practicable.</u> As such less than one percent a small proportion of the District's 12,763 hectares of designated Green Belt land will be reallocated to meet local housing and employment needs.
66	6.6 (line 6-8)	Previous community involvement exercises have made it clear to the Council that the District's residents consider the protection of the Green Belt to be very important, as does national and regional policy.
82	8.34	The East of England Plan (2008) requires Local Planning Authorities to encourage developers to incorporate decentralised renewable or low carbon energy technologies to help achieve the Government's targets for reducing carbon emissions. , and the Council's local policy is in line with its aims. <u>Notwithstanding the revocation of the East of England Plan, such an approach is still considered a sustainable one.</u>
96	9.36	Leisure activities have an important role to play in health, quality of life and the economy. <u>The importance of having good, accessible leisure facilities is iterated in the East of England Plan.</u>
103	10.1	The East of England Plan incorporates a Regional Transport Strategy (RTS) which outlines the delivery of funding for transport initiatives, and also sets out transport policies which are in line with the objectives of the East of England Plan. The Regional Transport Strategy is a statutory document and as such is influenced by the delivery programmes of both the Highways Agency and Network Rail. In turn, the Regional Transport Strategy will then help to shape Local Transport Plans (LTP) which are produced by Local Highways Authorities; namely County and Unitary Councils. The Local Transport Plan covering the district of Rochford is produced by Essex County Council and the current LTP covers the time period 2006-11.
113	11.4	In the past, employment allocations for the District were quantified in terms of the amount of land to be set aside for employment purposes. <u>The East of England Plan instead specifies the number of jobs each sub-region must provide. Rochford District is within the Thames Gateway sub-region and must provide 3000 new jobs during the plan period. It is considered more appropriate to express employment allocations in terms of number of jobs. In Rochford District, it is considered appropriate to ensure at least 3,000 jobs are provided during the plan period.</u> A significant proportion of these jobs can be accommodated as part of the growth around London Southend Airport and the Council will produce a Joint Area Action Plan with Southend Borough Council to ensure that the airport's potential is fully realised, whilst having regard to environmental and amenity

		impacts such as noise, air quality and traffic generation.
117	11.20	The East of England Plan identifies London Southend Airport <u>has</u> as having an important role to play in the economic development of the area. London Southend Airport...
133	H2 (The 3 rd column)	Extensions to the residential envelope pre-2026 pre-2021 in the identified general areas are not delivered in time, and there is not a constant five-year housing supply.
134	H3 (The 1 st column)	H3 - Extension to residential envelopes post-2021 <u>post-2026</u>
134	H3 (The 2 nd column)	Sites within the identified general locations will not be allocated for development until post-2021 <u>post-2026</u> . Such sites will be prevented from development until an appropriate time through the development management process. Post-2021 <u>Post-2026</u> , the completion of dwellings will be carried out by developers having regard to the Council's adopted policies in the Local Development Framework, guided by the Council's development management.
134	H3 (The 3 rd column)	Extensions to the residential envelope pre-2021 <u>pre-2026</u> in the identified general areas are not delivered, and there is not a constant five year housing supply. Extensions to the residential envelope post-2021 <u>post-2026</u> in the identified general areas are not delivered. and there is not a constant five year housing supply.
134	H3 (The 4 th column, second paragraph onwards)	As such, some sites may be brought forward from post-2021 <u>post-2026</u> allocations, if allocated sites pre-2021 <u>pre-2026</u> are not delivered. Where post-2021 <u>post-2026</u> sites are brought forward for development, it is anticipated that pre-2021 <u>pre-2026</u> sites which were not delivered through earlier phasing, will be delivered <u>post- 2026</u> . However, if there are not enough deliverable sites, then the Council will review the situation through the Local Development Framework Process.
140	GB1 (The 4 th column)	...By allocating land for the development the District is required to <u>must</u> accommodate to meet local needs, the Council will be able to ensure that land allocated in the Local Development Framework as Green Belt remains protected from inappropriate development.
141	URV1 (The 4 th column, second paragraph)	...By allocating land for the development the District is required to <u>must</u> accommodate to meet local needs, the Council will be able to ensure that land allocated in the Local Development Framework as Green Belt remains protected from inappropriate development.

3.0 LAND AT SOUTH WEST HULLBRIDGE

- 3.1 As set out above, we have stated that the location at SW Hullbridge is unconstrained and can be brought forward much earlier than postulated in either the CSS or Proposed Changes. Our reasons for this have been set in broad terms in our response to the CSS and at the Examination. However, since then, a great deal more work has been undertaken and the following sets this out to provide the Council/Inspector with the comfort that SW Hullbridge as a location can be brought forward from policy H3 to H2 as proposed to be amended, and as set out in our final section which sets out how we wish the CS to change.

The Site

- 3.2 The built up area of Hullbridge is formed largely from post World War II housing. The urban areas northern boundary fronts onto the Crouch Estuary. The town is laid on a regular grid street pattern developed from the town's plotland roots, with the rectangular roads of the plotland development is itself a reflection of the pre-existing strong rectilinear field system which are likely to be of ancient origin. The present street pattern follows the original plot and layout although now heavily infilled with post 1950 developments.
- 3.3 The land controlled by Southern and Regional Developments Ltd is identified as the majority of the area shown on the plan attached as appendix 1 and comprises an area of approximately 19 hectares located generally on the south-western edge of Hullbridge.
- 3.4 Consideration has been given to the historic origins of the site within the wider context of Hullbridge, which highlighted the enduring Croach and Roach farmland field pattern which defines the character of the landscape setting in the area.

Townscape Analysis

- 3.5 An understanding of local context is fundamental in ensuring a sensitive and appropriate design response and in ensuring that the local townscape and heritage is respected. A townscape character analysis of Hullbridge has been undertaken, which comprised an analysis of seven areas within Hullbridge and the surrounding settlements, attached as appendix 3a. This appraisal of local densities, patterns of development and architectural style will ensure that the masterplan for the site is responsive and appropriate to the local area.

Constraints and Opportunities

- 3.6 Although currently located within the Green Belt, the site is located outside of any landscape, ecological, flood, or coastal protection designations, and is located away from strategic gaps between settlements previously defined by the Council in earlier drafts of the Core Strategy. Careful consideration has been given to the strategic site context in