

## **HOCKLEY AREA ACTION PLAN (HAAP)**

### **ISSUES AND QUESTIONS – final version**

#### **Issue 1**

Is the overall strategy for development within the HAAP area sound having regard to the needs and demands of the area; the relationship with other plans, national policy and Government objectives and the evidence base and preparatory processes?

#### Questions

- i) Is the vision for Hockley sound and, if not, what alternative vision should be pursued and why?
  - ii) Does the HAAP relate satisfactorily to the Core Strategy and the Site Allocations Document – particularly Policy RTC6 of the Core Strategy?
  - iii) Have the legal requirements regarding consultation been met and has this been in accordance with the Statement of Community Involvement and Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012?
- i) The Core Strategy sets out the overarching policies that have guided the development of the HAAP. The Core Strategy was adopted on 13 December 2011 and forms part of the development plan for the district. All other planning policies for the district stem from the Core Strategy.

The priorities of the HAAP are identified in the Core Strategy. In particular Policy RTC6 which sets out positive and achievable changes as a basis for the future development of Hockley. This strategy for Hockley was adopted as part of the wider Core Strategy in 2011.

Policy RTC6 of the Core Strategy sets out the following goals for the HAAP to deliver:

- A safe and high quality environment for residents
- Enhanced retail offer for Hockley
- Redevelopment of Eldon Way/ Foundry for a variety of uses more appropriate for a town centre location, including residential, commercial, employment and leisure
- A public space within a defined centre
- Improved connectivity between retail focus and train station
- Redevelopment of industrial uses for retail, leisure and residential development
- Green Landscaping along Main Road, Spa road and Southend Road to enhance the visual amenity

These goals were essential in establishing the vision and direction of the HAAP.

The vision for Hockley Town Centre is guided by both local and national policy. Paragraph 23 of the NPPF requires that planning policies for town centres should promote town centres as the heart of their communities and should ensure that they can adapt and accommodate future economic changes. It requires that Councils ensure that town centres are enhanced and retain a diverse retail offer. These goals are

expressed in the vision for Hockley in both the Core Strategy and the HAAP.-They seek to provide greater shopping choice, environmental improvements, reuse previously developed land and protect local employment.

Alternative visions for the HAAP were suggested by RDC during earlier stages of the consultation process. These options were, particularly during the earlier stages of the consultation process, much more interventionist and far reaching in their scope. The options were subject to significant public consultation. RDC considered the views of the public and in response to the views that were put forward the less interventionist options for Hockley were chosen.

- i) The HAAP is well related to the policies set out in the Core Strategy, particularly RTC6. The HAAP incorporates all seven of the key objectives from policy RTC6.

Land allocation options, such as BFR2 – Eldon Way/ Foundry Industrial Estate are identified in both the HAAP and the Allocations Document. To avoid the repetition of policy the specifics of the redevelopment of this site are covered in the HAAP itself.

- ii) The HAAP has been prepared in accordance with the Statement of Community Involvement (SCI), evidence to this effect can be found in the HAAP Consultation Statement. The HAAP was prepared in accordance with the Town and Country Planning (Local Planning)(England)Regulations 2012 since they came into effect on 6 April 2012, especially Regulation 18. The SCI was prepared before the changes to the regulations took place, the community involvement processes set out in it are still relevant and have been adopted throughout the preparation of the Plan.

Early public participation and consultation began in 2008. This included:

- A Placecheck event on 23 February 2008.
- Online consultation on the placecheck.
- Awareness raising exercise with local schools and workshop for students.
  
- Formal consultation on the HAAP Issues and Options Report 13 February 2009 and 30 April 2009.
- Public meetings, including Central Area Committee.
- Rochford District Matters article
- Press release.
  
- Public drop in session at Greensward Academy, Hockley, on 2 August 2010 and on 27 August 2010.
- Options Document published for consultation, 30 November.
- Representations invited 30 November 2010 to 4 February 2010.
- Public Drop in session was held on 16 November 2010.
- Public meeting in Greensward Academy on 7 December 2010.
- Public Drop in session 10 January.
  
- Exhibition, 14 August 2012 to 24 August 2012.

## Rochford District Council – HAAP Submission Document Examination: Council’s Response to Issues and Questions

---

- Submission Document published for pre-submission consultation, 29 November 2012 to 25 January 2013.

More information on the engagement and consultation process undertaken for the HAAP can be found in the Consultation Statement.

### **Issue 2**

Is the policy for better movement justified, deliverable within the plan period and consistent with national policy?

#### Questions

- i) Is there a need for a transport assessment for Hockley or for the wider District to be undertaken as a pre-cursor to the HAAP?
  - ii) Is it sufficient to rely upon improvements coming forward in relation to individual planning applications?
  - iii) How will the schemes referred to in Policy 3 be realised given that the Council is not the Highway Authority?
  - iv) How will adequate car parking provision be made other than in relation to the Eldon Way Opportunity Area?
- i) At present there is no need for a transport assessment with respect to the HAAP. The Core Strategy, part of the development plan for the District, already considers principles with impacts that policies such as the HAAP are likely to have on the District.

RDC has regular liaison with Essex County Council Highways Department; evidence of this close cooperation is appended to this document. RDC does not feel that it is necessary for a transport assessment to be carried out at this time.

RDC will require that Transport Assessments be required at the development proposal stage.

ii) Appendix H1 of the Core Strategy outlines specific infrastructure improvements that RDC will pursue through developer contributions and other developer obligations.

Policy CLT1 of the Core Strategy requires developers to enter into legal agreements in order to secure planning obligations to address specific issues relating to developments. The Core Strategy has been adopted and these requirements will be applied to the AAP Area where appropriate.

The HAAP has been subject to viability testing. GL Hearn Property Consultants have provided RDC with a Viability Note which confirms that the plans for relevant infrastructure provision in Hockley will be viable.

- iii) RDC has a close working relationship with ECC and is in regular contact with ECC regarding the wider transport strategy for the region as well as other local transport issues. RDC has consulted ECC Highways Department for advice regarding relevant issues.

ECC Highways team have submitted formal representations to RDC in which they raised issues which they felt were key regarding the HAAP. RDC took these representations into consideration when determining the course to be taken with the HAAP. The representations can be viewed online and were submitted to the Inspector.

RDC has also consulted with a transport consultant working with AMUP (Allied Morrison Urban Practitioners) who have provided advice on the transport issues affecting Hockley.

iv) The limited size of Hockley means that there is relatively little scope for the consolidation of parking in the town centre without using the Eldon Way Opportunity Site as a means to consolidate parking.

Parking is also available at present in several areas around Hockley such as at the library and train stations.

### **Issue 3**

Are the policies for the Eldon Way Opportunity Area justified, deliverable within the Plan period and consistent with national policy?

#### Questions

- i) Given the different land interests referred to in section 2.6 of the HAAP what are the prospects of mixed-use development taking place during the Plan period?
  - ii) Is the proposed quantum of housing of 100 new dwellings appropriate given site constraints including neighbouring uses?
  - iii) Bearing in mind the Retail & Leisure Study of 2008 and other evidence is there a justification for a food store of 3,000 sq m (gross) as indicated in Policy 6?
  - iv) If not, what are the implications for the HAAP?
- 
- i) The HAAP sets out the direction that RDC would like to see development in the area take. RDC envisages development coming forward as part of the natural development process.

The HAAP has undergone viability testing in terms of its methods for promoting mixed use development.

With regards to the Eldon Way Opportunity Site in particular, the Viability Note from GL Hearn shows the majority of the site is owned by a single land owner. Additionally a land ownership map of the area has been submitted as part of the evidence base.

- ii) The capacity Study provided by AMUP suggested that Hockley could accommodate more than 100 new dwellings however once suggested areas for employment, retail and leisure were factored in, the figure was reduced. Furthermore, the Council were mindful of the results of community involvement when selecting the number of dwellings.

Although the HAAP SA shows that an addition of more than 100 new houses would have a positive effect in terms of housing affordability. RDC was mindful of public opinion when setting this figure.

The NPPF requires that brownfield land should be prioritised for housing. In keeping with this strand of national policy the Council’s Core Strategy also sets the objective that brownfield land should be utilised where development would be viable and deliverable.

- iii) The Core Strategy identifies the need to address the leakage of retail expenditure outside of the District. The Core Strategy proposes that the vast majority of new retail development be directed towards Rochford, Rayleigh and Hockley. In the long term it seeks to ensure that they are vibrant places containing a range of uses and activities.

The Retail leisure study found that Hockley loses a significant amount of retail expenditure to other areas.

It is important to note that the RLS looks at Hockley as it is now, assuming that current trends continue, and does not make specific proposals for the future development of the Town over the Plan period.

The GL Hearn Viability Note states that food retail will be the main value driver for the development in the Eldon Way Opportunity site.

It should be noted that based on recent developments elsewhere such as the Asda store in Rayleigh which has a gross floorspace of 3002sq m and the Braintree Tesco which has 3008sq m of gross floorspace, discussions with AMUP have shown that the 3000sq m food store would in practice be likely to include approximately 2000sq m of net retail floor space with the remainder being used for storage and non-retail purposes.

Additionally when setting the figure of 3000sq m it was RDC’s intention to set an upper limit on the possible size of any food store. As such while viability testing has shown that Hockley has the potential to accommodate a store of 3000sq m this does not mean that RDC would be unwilling to approve part of an application for a food store of less than 3000sq m (gross).

- iv) RDC is committed through the Core Strategy which is the Development Plan for the District to produce an area action plan for Hockley.

The Core Strategy also sets out in Policy RTC6 that RDC will pursue the redevelopment of Eldon Way/ Foundry for a range of uses including residential, commercial, employment and leisure.

RDC propose to apply the 3000sq m upper limit for a new food store in Hockley due to concern that a larger food store would be overly dominant and detrimental to the local economy and Hockley more widely. This view is supported by RDC’s economic development team (as per their letter, a copy of which is available as Appendix 5 of the consultation statement) and the results of community involvement. Furthermore AMUP’s viability work and research supporting the production of the HAAP indicated that a store of greater than 3000sq m (gross) may not be viable in Hockley.

The redevelopment of the Eldon Way Opportunity Site and the proposed food store are identified in the Viability Note from GL Hearn as being major value drivers in the Eldon Way Opportunity Site meaning without it the redevelopment Eldon Way will be less likely.

**Issue 4**

Are the retail policies justified, likely to be effective and consistent with national policy?

Question

- i) Is the wording of Policy 7 likely to be effective in identifying areas where it may be necessary to limit freedom to change the use of buildings?
  
- i) Policy 7 ensures that planning applications can be considered on their own merits whilst still offering a sufficiently robust guide to individuals. It sets out conditions under which non-A1 uses would be permitted whilst not being overly prescriptive.