



8 July 2011

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

Dear Sir/ Madam
Rochford Core Strategy
Review of Sustainability Appraisal
Gypsy-Traveller policy H7

I confine my response to matters concerning Gypsy-Travellers site provision.

The danger of undertaking an exercise of this kind 'after the event' is that it smacks of drafting something to justify something already predetermined. No where are we referred to committee documents to show where options and audit trails are detailed or have been discussed with Councillors or the public.

I only realised today that the Council has amended Core Strategy policy H7. This is not readily apparent studying the web site as copies of the original are still posted and there is no date to the addendum. As recently as 21 October 2010 the Council was still reporting (see committee report for Cherry Hill Farm, Chelmsford Road 10/00582/COU) that Policy H7 required 15 pitches by 2011 in accordance with the East of England Plan. Had I realised it had been altered I would have objected. Revised H7 is not sound. It fails to comply with RSS Policy H3 which has not been revoked and is still current development plan policy. The urgent and pressing need to provide 15 additional pitches by 2011 and a 3% compound growth thereafter remains, yet it has been reduced to a need for 14 pitches by 2021. This is planning by stealth. This is not transparent. With over 350 local authorities in England it is impossible for the handful of planning consultants and voluntary organisations who work for and on behalf of Gypsy-Travellers to monitor every local authority's policies but local authorities should not treat this as a licence to do as they please. The current shortfall in provision stems from the failures of policies drafted under C 1/94 to deliver sites. It is essential that development plan policies drafted under C 1/2006 do not repeat these mistakes.

The 2009 Fordham Research Essex Gypsy and Traveller Accommodation Assessment identified an immediate need of 11.7 pitches in Rochford for the period 2008-2013 and an annualised additional pitch requirements of 2.3. The base date was 2008. It is unclear from this why Policy H7 now only seeks 14 pitches by 2021. This is an open invitation to do nothing for another 11 years. Rochford Council has already failed to address the immediate need in accordance with C 1/2006 and RSS Policy H3.

Strategic Option 7: Accommodation for Gypsies and Travellers of the SA Report Addendum is very confusing. We are told only two alternatives were considered.

- a) No sites in the Green Belt
- b) Accommodation to be met in existing residential areas

With respect these are not alternatives: they seem to amount to the same thing. In Rochford 76% of the borough is Green Belt. It is unclear where else the Council considered suitable for site if it was not in the Green Belt and not in settlement boundaries – MOD land? RAMSAR mudflats?

If I am right and they are the same thing how can the assessment of options be different?

It is unclear how the Council can claim that no development in the Green Belt would have no significant effects for the short-longer term with some minor negative impacts. It means draft core strategy would have to be rethought and re written as Policy H7 advises that current unauthorised sites, all of which are in the Green Belt, would be examined to meet the immediate need for sites. It would mean all existing unauthorised sites would have to be relocated. This would most probably be at considerable public expense as it is unlikely site occupants would have the resources to purchase land within urban areas. It would rule out 76% of the borough from the search for suitable sites. It would mean a complete rethink of the draft Allocations DPD which only identified 7 possible sites for Gypsy-Travellers all of which were in the Green Belt. Finally it would be inequitable to deny Gypsy-Travellers the possibility of locating sites in the Green Belt given that the Council has agreed it will have to release some Green Belt land for housing. Probably no more than 2 hectares would be required of the 12 763 hectares of Green Belt in Rochford to address the current and immediate need for 15 pitches.

Restricting Gypsy-Traveller sites to existing residential areas would raise doubts about deliverability of policy. Core Strategy policy H1 refers to a need for high density schemes in town centre areas of 75+ dwellings per hectare. You can not stack 'em high when it comes to caravan sites. In an area so constrained by Green Belt and other environmental restrictions, prudent use needs to be made of expensive land within settlements boundaries. Gypsy sites are an inefficient use of prime development land. It is unclear how the Council can claim Option B would result in a greater amount of positive effects over the same time period. Positive effects for whom? For those who do not want to see any new Gypsy-Traveller provision?

The SA Report Addendum then states that the preferred approach was developed having regard to the above and other issues such as deliverability and land supply. But we are not told what the preferred approach is. Other Strategic Options explain what option was followed. It is not clear which Option, A or B, was followed. It is not clear if the preferred option is in fact another option which we have not been given details of, for example a combination of A and B.

Core Strategy Policy H7 states that sites will be allocated in the west of the district. But this is not one of the two options listed. I have not seen a map showing where the east-west boundary lies. The criteria listed do not rule out sites in the Green Belt nor do they restrict sites to within settlement boundaries. The policy states that consideration will be given to granting planning consent for current unauthorised site subject to advice in C 1/2006. C 1/2006 is quite clear. Sites in the Green Belt should be considered as a last resort. Para 49 states quite clearly that alternatives should be explored before Green Belt locations are considered. In the absence of any indication that Rochford Council has

searched for sites in settlement boundaries the soundness of this policy has to be brought into question and it is unclear how planning consent will be granted for any sites in the Green Belt.

In the knowledge that the Coalition Government has published details of a draft PPS to replace C 1/2006 it is considered most unwise to adopt policy which relies on guidance that could be soon replaced or altered.

There is yet more confusion when one has regards to the Allocations DPD Discussion and Consultation document February 2010. As noted above this only identifies 7 sites all of which are in the Green Belt. The Council has not published details of the consultation exercise. It is not clear how or where this fits into the thinking behind the Core Strategy process.

In short, it is not clear what options or alternatives have been considered and explored in formulating policy. When I contacted the Council for more information I was told that the SA Addendum was really only concerned about housing developments not Traveller sites. However the draft PPS to replace C 1/2006 is concerned with fairness and equality. Provision for Gypsy sites is to follow the process for housing development. It is not supposed to be singled out and ignored. As we all know Gypsy-Traveller sites are 'hard to place' development. The plan making process needs to be robust and transparent if, for the first time, sites are to be identified and allocated rather than rely, as hitherto, on criteria policies. As para 34 of C 1/2006 warned local authorities: *'Identifying and allocating specific plots of land is a more difficulty process than using a solely criteria based approach'.*

In summary it is unclear what evidence base, if any, has informed Core Strategy Policy H7. There is no audit trail to show whether there are any suitable sites in settlement boundaries that are deliverable and if not, what was considered and why it was rejected. If Green Belt sites are to be relied on as a last resort there is no consideration or analysis of which land should be released first, how much, where and whether Green Belt boundaries should be modified to remove land from the Green Belt to meet need. The Council has not produced an evidence base that accords with policy and is justifiable and transparent. From this one can only conclude that there has been no consideration of reasonable alternatives as policy has failed to properly identify the options considered. If this is a requirement of the plan making process it must surely follow that the Core Strategy is not sound.

Yours sincerely

